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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

-----  
Cynthia Donald

Plaintiff,

vs.

Case Number 2020 CV 06815

City of Chicago, et al.,

Defendants.  
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Video Recorded Deposition of  
Claudio Eduardo Salgado Yanez

Thursday

July 14, 2022

-at-

Hart McLaughlin & Eldridge

22 West Washington Street

Suite 1600

Chicago, Illinois 60602

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APPEARANCES

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1 THE RECORDER: Okay, good morning. We are  
2 now on record on Thursday, July 14th, 2022. The time  
3 is 10:15 a.m. We are located at Hart McLaughlin &  
4 Eldridge 22 West Washington Street, Suite 1600,  
5 Chicago, Illinois, 60602 for a video recorded  
6 deposition in the matter of Cynthia Donald versus City  
7 of Chicago et al. Case number 2020 CV 06815 before the  
8 United States District Court for the Northern District  
9 of Illinois Eastern Division.

10 This deposition is being reported by In  
11 Demand Court Reporting, located to 216 South Washington  
12 Street, Chicago, Illinois, 60661 on behalf of the  
13 defendant being taken as still defendant. The witness  
14 today is Claudio Edwardo Salgado Yanez.

15 Mr. Salgado Yanez, my name is Christina  
16 Kollintzas. I'm a notary public and video recording  
17 device operator this deposition. At this time, would  
18 you please raise your right hand for the oath?

19 (Witness sworn)

20 THE WITNESS: Good morning. I do.

21 THE RECORDER: Thank you. Will the  
22 attorneys, please state their appearances for the  
23 record?

24 MR. LEONARD: Mike Leonard on behalf of  
25 Defendant, Eddie Johnson.

1 MR. MCLAUGHLIN: Robert McLaughlin for  
2 Plaintiff.

3 MR. SUHL: Matthew Suhl for the City of  
4 Chicago.

5 MS. Woytowicz: And Kristen Woytowicz for the  
6 City of Chicago.

7 THE RECORDER: Thank you, that completes our  
8 record information. We can now proceed.

9 DIRECT EXAMINATION

10 BY MR. LEONARD:

11 Q. Good morning, sir.

12 A. Good morning, sir.

13 Q. As I stated, my name is Mike Leonard. I  
14 represent Eddie Johnson in this lawsuit. And today  
15 we're here to take your deposition. Have you been  
16 deposed before?

17 A. Yes, sir.

18 Q. How many times?

19 A. Approximately two times.

20 Q. What types of cases were those?

21 A. Not recalling.

22 Q. Excuse me?

23 A. No recalling.

24 Q. No, what type of lawsuits were those?

25 A. Narcotics. I believe there was one in

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1     narcotics and I don't recall what the other was. But  
2     it was one from narcotics, I believe so.

3             Q.     Okay. Those were civil lawsuits?

4             A.     Yes, sir.

5             Q.     Okay. Were you named as a party in the case?

6             A.     Witnesses.

7             Q.     Okay. And the rules are probably the same.  
8     I'll ask you verbal questions. Have you give verbal  
9     responses. If you don't understand my question or need  
10    clarification, please stop me, and let me know. Okay?

11            A.     Sure.

12            Q.     If you don't do that, we'll assume that you  
13    understood the question as asked. Okay?

14            A.     Okay.

15            Q.     And from time to time, the attorneys may make  
16    objections to my questions. If they do let them make  
17    those for the record, unless your attorney tells you  
18    not to answer the question, you would then proceed to  
19    answer the question. Okay? Yes?

20            A.     Yes, sir.

21            Q.     And if you need a break at any time and a  
22    question's not pending, we'll certainly accommodate  
23    you. Okay?

24            A.     Thanks, sir.

25            Q.     Any reason you can't give truthful testimony,

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1 medications, tiredness, lack of preparation? Any  
2 reason whatsoever?

3 A. No, sir.

4 Q. Okay. Did you do anything to prepare to  
5 testify here today?

6 A. Well, meet with the city attorneys. Yes.

7 Q. Okay. And when did you meet with them?

8 A. Today in the morning.

9 Q. Okay. For about how long?

10 A. Maybe an hour, approximately one hour.

11 Q. Have you reviewed any documents about the  
12 Cynthia Donald lawsuit?

13 A. No.

14 Q. Have you read the lawsuit?

15 A. No.

16 Q. Okay. I'm going to ask you first some  
17 questions about your own background and we'll talk  
18 about the Donald/Johnson issues. Okay?

19 A. Sure.

20 Q. First of all, what's your educational  
21 background?

22 A. My -- I went to the doctoral level in  
23 clinical psychology. I finished the program but didn't  
24 finish my residency. So I graduated with a master's  
25 degree in clinical psychology and master's degree in

1 criminal justice at Loyola University.

2 Q. Okay. And that was about what year?

3 A. 2010, or eight, approximately around there.

4 Q. And I never asked you, Christina, when we  
5 were off the record, never asked you to state and spell  
6 your full name for the record. Can you just do that?

7 A. Claudio Eduardo Salgado Yanez.

8 Q. And I'm sorry, what year did you say you got  
9 your degree from Loyola?

10 A. Loyola University for the criminal justice  
11 degree was in, I think, 2005 or 2004. And my master's  
12 degree in clinical psychology for Loyola School of  
13 Psychology and University was in, I think, 2000. I'm  
14 not sure, but I think 2012 or 10.

15 Q. And did you grow up in the Chicago area?

16 A. No, I grow -- where I grow up or?

17 Q. Yeah.

18 A. No. I grown up in Argentina, in Chile, South  
19 America.

20 Q. Two countries that are still on my list to  
21 visit. Someday I'll get there.

22 A. Very nice.

23 Q. And what year did you move to the United  
24 States?

25 A. I came to United States in 2001.



1 Q. And then what was your first sort of  
2 professional employment? Was it during the time period  
3 you were going to school or is that after?

4 A. In United State or?

5 Q. Yeah.

6 A. In United States, it was -- I came out to --  
7 first, I enrolled in college. I went to Purdue  
8 University, Lafayette.

9 Q. And what year? What years was that?

10 A. 2001.

11 Q. Okay.

12 A. To obtain my Bachelor's Degrees in political  
13 science and a Bachelor's Degree in criminal justice.

14 Q. You're not a boilermakers fan. Are you?

15 A. No.

16 Q. Okay.

17 A. I like soccer, I like football.

18 Q. Okay. And so you got your undergraduate from  
19 Purdue?

20 A. Purdue University. Yes, sir.

21 Q. And then did you start your professional  
22 employment after that?

23 A. Yes, I went to -- I worked for almost two  
24 years at DCFS. I was a social worker investigator.

25 Q. And what was your next job after that?

1 A. Chicago police office.

2 Q. So you started with CPD in 2005?

3 A. Seven.

4 Q. 2007. Okay. What was your first position?  
5 Patrol officer?

6 A. Patrol officer, yes.

7 Q. In what district?

8 A. Six.

9 Q. And how long were you a patrol officer in the  
10 sixth district?

11 A. During my training, when I was a PBO, my  
12 training, I was approximately two years.

13 Q. And when you were in a sixth district, did  
14 you know Eddie Johnson?

15 A. Yes.

16 Q. Was he your watch commander?

17 A. Yes.

18 Q. And did you know him well?

19 A. Only for as commander. He was my supervisor.

20 Q. Okay. During that period of time, you didn't  
21 socialize with him?

22 A. He called me approximately maybe two, three  
23 times. I'm very well-known for my language skills  
24 because I speak more than 10 languages. So he called  
25 me in the office at the time. And asking me, Hey, you

1 know, different departments, they're always requesting  
2 you translate. You know, I get Russian, French,  
3 Italian. And so he say the viewer detective, they're  
4 always looking for you, the other units, narcotics,  
5 organized crime, they're looking for you. So that's  
6 how he know me because of my language is skills and  
7 they always say, "I never forget you because you're  
8 only guy who speak more than 10 languages." That was  
9 the only conversation we had at the time.

10 Q. Okay. And then after the sixth district,  
11 where did you move next?

12 A. To the first district.

13 Q. And was Eddie Johnson in the first district  
14 at that point in time?

15 A. No.

16 Q. And how long did you stay in the first  
17 district?

18 A. First district, I stayed in the building in  
19 the first district for approximately maybe four years.  
20 And then I went to Saturation Team Area Central, who  
21 was located in the building, in the first district.  
22 And I was approximately at Saturation Team Area Central  
23 for six years, approximately.

24 Q. Okay.

25 THE RECORDER: I'm sorry the?

1 MR. LEONARD: Saturation.

2 THE WITNESS: Saturation Team Area Central.

3 Yes.

4 BY MR. LEONARD:

5 Q. So you were basically in the first district  
6 in two different positions for about 10 years?

7 A. Yes, sir. Approximately.

8 Q. And during that period of time, did you have  
9 any continuing, you know, relationship or friendship or  
10 contact with Eddie Johnson?

11 A. No, only contact, brief contact. He was at  
12 the time commander of bureau patrol at the time. He  
13 was on the building too, but I didn't see him too many  
14 times; only parking lot and exchange hi and bye, you  
15 know?

16 Q. And during that 10-year time period in the  
17 first district, did you know Cynthia Donald at all?

18 A. Yes.

19 Q. And do you remember approximately what year  
20 you first met her?

21 A. As soon I finished my probation training at  
22 six, 2008 and approximately 2009.

23 Q. And was that when she was going through the  
24 academy or she was assigned to the first district, what  
25 was her position when you first became aware of her?

1           A.     She was at the time assigned to the first  
2     district, she was patrol.

3           Q.     Okay. And what was your position when she  
4     started in patrol in 2009?

5           A.     I was a patrol, too. I was an officer.

6           Q.     Okay. Were you ever partners with her?

7           A.     Yes.

8           Q.     And what period of time was that?

9           A.     I didn't was -- we didn't was like a partners  
10    like for a long time or period. It was sometime  
11    because when I was there, I was in the third watch and  
12    she was sometime day, sometime afternoon, sometime  
13    midnight. So once a while we worked together.

14          Q.     Okay. So there were -- and how -- and for  
15    what period of time did you sometimes work together  
16    with her as a partner? What period? How many years or  
17    months?

18          A.     Approximately, nine, ten, maybe three years.

19          Q.     All right. And during those three years, how  
20    often would you be partnered up with her on a shift?

21          A.     During the week, maybe twice.

22          Q.     And then during those three years, would you  
23    say you became friends with her?

24          A.     Acquaintance.

25          Q.     Okay. During those three years, did you ever

1 see her outside of work for instance, for a drink or  
2 have dinner or anything like that?

3 A. No.

4 Q. Okay. Did you ever outside of work, during  
5 those three years, would you guys ever talk to each  
6 other or text each other, anything like that?

7 A. No.

8 Q. All right. And then after those three years,  
9 then, did you continue to see her or encounter her  
10 professionally while you were in the first district?

11 A. No.

12 Q. So when you became a member of the saturation  
13 team, your contact with her, certainly as a partner  
14 would've stopped, right?

15 A. Yes.

16 Q. And then would you see her around the  
17 building, that type of thing?

18 A. Yes, yes. Okay. Parking lot occasionally.

19 Q. Okay. And just say hi and stuff like that?

20 A. Yep.

21 Q. Did you ever socialize with her when you were  
22 on the saturation team and no longer her partner, but  
23 she worked in the first district. Did you ever  
24 socialize with her?

25 A. No.

1 Q. All right. And then after the saturation  
2 team, what year did your work on the saturation team  
3 end, approximately?

4 A. 2019.

5 Q. And then at that point, what was your next  
6 position?

7 A. I was assigned to narcotics, organized crime  
8 narcotics.

9 Q. Where were you located?

10 A. At the Homan Square Building.

11 Q. Okay. And at that, during the time period  
12 from beginning of the saturation team, up until  
13 narcotics in 2019, did you have any continuing  
14 professional or personal relationship with Eddie  
15 Johnson?

16 A. 2019, yes.

17 Q. Okay.

18 A. In the year, 2019.

19 Q. Before 2019?

20 A. No, no.

21 Q. Okay.

22 A. Not all.

23 Q. And then what happened in 2019, that sort of  
24 re-brought your relationship together with Mr. Johnson?  
25 What was the event?

1           A.     2019 in January, every year in January, I  
2     drop my tuition reimburse form and my student  
3     forgiveness loan form. So I got to proceed to go to  
4     the headquarters to drop all these documents. And at  
5     the time I saw Cynthia Donald in the building and we  
6     exchange words, we say hi. And she asked where I am  
7     now, what I'm doing. And I asked him, what are you  
8     doing? And she told me that she was assign to a  
9     bodyguard for the superintendent details. And I said,  
10    oh, congratulations. That's very nice. And we  
11    exchanged phone numbers. And she stated that Eddie  
12    Johnson, you know, it's highly, highly talking good  
13    things about you. That you're a very smart guy, very  
14    intelligent, very dress nice and very polite, very well  
15    in knowledge. And I said, oh yeah, I know him for a  
16    long time. And she, at the time, I didn't even know  
17    that. Yeah, he was my commander at six. And, then she  
18    said, well, he's highly good spoken about you. He's  
19    your very gentleman. And that was it. And then --

20           Q.     Okay, we'll stop you there. Do you remember  
21    what, approximately, what month in 2019 that --

22           A.     January.

23           Q.     January. Okay.

24           A.     Because every January I dropped my form for  
25    tuition reimbursement and student forgiveness loan.



1           Q.    Okay.  So you hadn't seen Donald in a number  
2   of years?

3           A.    Yeah.

4           Q.    And then did that conversation last, say 10  
5   minutes or more?

6           A.    Maybe a half hour.

7           Q.    Half hour.  Okay.

8           A.    Talk about family, travel, my family, et  
9   cetera.

10          Q.    Kind of catching up with each other.

11          A.    Exactly, yeah.

12          Q.    Did she talk about her marital status when  
13   you saw her?

14          A.    No.

15          Q.    Okay.  Did she talk about her children?

16          A.    No.

17          Q.    Did she indicate to you that she was happy  
18   and was enjoying the job working for Eddie Johnson?

19          A.    Definitely, yes.

20          Q.    Very happy, right?

21          A.    Very.

22          Q.    Did she say anything specific about why she  
23   liked the job or why she liked Mr. Johnson?

24          A.    Because she stated, at the time, the  
25   superintendent, it was a very, very nice person.  He

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1 was a very good person. And I remember, too, and I  
2 say, yes, he's a very good man. And I stated to her,  
3 learn as much you can, get in as much experience you  
4 can and you are blessing. It's a great opportunity for  
5 you know, to be here and working for the superintendent  
6 because he is a good guy.

7 Q. Did she tell you how long she had been in the  
8 job?

9 THE RECORDER: I'm sorry.

10 MR. LEONARD: I'm sorry.

11 THE RECORDER: She's a -- the end of your  
12 answer.

13 THE WITNESS: Oh, because I stated to her.  
14 He's a great guy. He's a good guy. He's a good  
15 mentor.

16 BY MR. LEONARD:

17 Q. Did she tell you how long she'd been in that  
18 position?

19 A. No.

20 Q. Did you have any idea how long she'd been in  
21 it?

22 A. No.

23 Q. Okay. But she -- so some of the things you  
24 remember, she said to you that he was a good man as  
25 well?

1 A. Yes.

2 Q. That she enjoyed working for him?

3 A. Yes.

4 Q. That she's very happy working for him?

5 A. Yes.

6 Q. That she thought it was a good opportunity.

7 A. Yes.

8 Q. And that she had a lot of respect for Eddie  
9 Johnson?

10 A. Yes.

11 Q. So you guys exchanged phone numbers that day?

12 A. Yes.

13 Q. And then how long was it until you next heard  
14 from her? Either you called her or she called you?

15 A. It was approximately in March of same year,  
16 February/March of the same year. I was in a Korean  
17 restaurant in the north side, having dinner with my  
18 Korean friends at San Soo Gab San. A Korean  
19 Restaurant. We have a --

20 Q. I'm sorry, what was the name of the  
21 restaurant?

22 A. San Soo Gab San.

23 Q. Where's that one located?

24 A. At Western Avenue in Peterson in Western,  
25 North side.

1 Q. Okay.

2 A. So we have a dinner with my friends. I speak  
3 a little bit of Korean. So we are all Korean friends  
4 at the time we had a barbecue and Cynthia called me and  
5 she say, "What are you doing? How is everything?" I  
6 say, oh, I'm having dinner, and I invite her. I invite  
7 her to come to enjoy with us. And --

8 Q. So you say just, why don't you come on over?

9 A. Yeah, invite her.

10 Q. Do you remember what time of night it was?

11 A. Oh, it was late in the afternoon.

12 Q. Sorry?

13 A. Late in the afternoon, yes. Yeah.

14 Q. Late in the afternoon. Okay. And did she  
15 indicate whether she was, where she was, whether she's  
16 working or not?

17 A. No.

18 Q. Okay.

19 A. Not at all. The only thing, which she stated  
20 that I would bring a guest that maybe you would like  
21 it.

22 Q. Okay.

23 A. And I say, bring it, no problem. You're  
24 welcome. And then she arrived with superintendent  
25 Eddie Johnson.

1 Q. Okay. So she -- you tell her, Hey, why don't  
2 you come join us? And she says, okay, I'm going to,  
3 and I'm going to bring basically a mystery guest,  
4 right?

5 A. It was. Yeah.

6 Q. Okay. And had you seen Eddie in a while  
7 before that?

8 A. No, at all. I mean, I was very surprised. I  
9 was very happy to see him. I was very, very excited  
10 and I told her, I say, thank you. That was a great  
11 day. And I'm very happy to see him. And we have a  
12 good -- we have a dinner that night.

13 Q. And you think that was either February or  
14 March of 2019?

15 A. It was in a winter time. It was  
16 February/March. March, it was colder because we even  
17 barbecued at the time. And I'd say cold, it was a cold  
18 time.

19 Q. Any recollection of what time they arrived?  
20 Ms. Donald and Mr. Johnson?

21 A. No, not recalling. Not recalling.

22 Q. Okay. So they come in, obviously you're  
23 happy to see Cynthia. You're happy to see Eddie.

24 A. Yes.

25 Q. And then how many people were you with that

1 weren't them?

2 A. One. John? Three people. More, three more.

3 Q. Your friends, three? You plus three?

4 A. Three, yes.

5 Q. Okay. And about how long were Eddie and  
6 Cynthia there that night for the dinner?

7 A. Definitely the place at the time before  
8 pandemic, the place close around three in the morning.  
9 We stayed until three, but Eddie and Cynthia left  
10 around 11 o'clock, 23:00 hours.

11 Q. Okay. So Eddie and Cynthia left together  
12 about 11:00 p.m.?

13 A. Yes.

14 Q. Do you have sort of your best estimate what  
15 time they arrived?

16 A. No, not recalling it.

17 Q. But in the evening hours?

18 A. It was in evening hours.

19 Q. So they might have been there two or three  
20 hours?

21 A. It was really dark, too. It was really dark.

22 Q. Okay. Would you estimate they were there for  
23 maybe two or three hours?

24 A. Two. At least two hours, yes,

25 Q. Okay.

1 A. Yes.

2 Q. Just stepping back for a minute, when you  
3 knew Cynthia back in the old days.

4 A. Yes.

5 Q. Do you know how much she drank back in the  
6 old days in terms of drink, her alcohol consumption?

7 A. No.

8 Q. But did you know whether she drank back in  
9 the old days or not?

10 A. Rumors, yes.

11 Q. Rumors?

12 A. Yeah.

13 Q. Okay. Meaning that in the old days, when you  
14 were sometimes partnered up or you heard rumors that  
15 she drank a lot?

16 A. Yes.

17 Q. From your fellow officers?

18 A. Yes.

19 Q. Did you ever experience that yourself?

20 A. No.

21 Q. Did she have a reputation as someone who  
22 drank too much?

23 A. Yes.

24 Q. Okay. Did you ever talk to her about that?

25 A. No.

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1 Q. Did she ever appear drunk during work during  
2 that time?

3 A. No.

4 Q. Okay. Now let's go back to this dinner in  
5 February or March of 2019. Did Cynthia sit next to  
6 Eddie?

7 A. Yes.

8 Q. Was there any physical contact between them?

9 A. Not at all.

10 Q. Okay.

11 A. Anything inappropriate, nothing at all. No  
12 hands touch, kiss, hold. Anything at all. Nothing at  
13 all.

14 Q. Were they dressed in civilian clothes?

15 A. Yes.

16 Q. And she seemed very happy?

17 A. Yes.

18 Q. Was it fair to say she was very talkative?

19 A. Yes.

20 Q. And was he seemed in a good mood as well?

21 A. Oh, yes.

22 Q. And talkative, is that is right?

23 A. Yes, right.

24 Q. Okay. And you saw how he treated her, right?

25 A. Yes. Very well.



1 Q. And you observed how he treated her for  
2 several hours?

3 A. Yes.

4 Q. And he treated her very well.

5 A. With respect.

6 Q. He treated her respectfully, like a man  
7 should treat a woman?

8 A. With respect and very professional.

9 Q. Okay. And she seemed very happy to be there?

10 A. Exactly.

11 Q. And it was her idea to bring Eddie there, not  
12 your idea?

13 A. Exactly.

14 Q. In fact, you didn't even know that he was  
15 going to be there?

16 A. At that time. I thought that she was  
17 enacting like a bodyguard. She was -- so it was very  
18 professional, very polite, and very respectful.

19 Q. Okay. Do you remember any of the subjects  
20 that she talked about that night? I know it's a long  
21 time ago and maybe hard to remember, but any subjects  
22 that she was talking about?

23 A. The subject regarding about this one?

24 Q. No, that night when she was there for the two  
25 or three hours for the dinner, any subject matters, you

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1 can remember that she was talking about that night?

2 A. No. The only thing with, I think, with I'm  
3 the kind of person that I like to talk about, travel,  
4 music, languages. So the subject was about travel,  
5 food, you know, around the world, clothes, you know,  
6 that was the main, nothing really about work.

7 Q. Okay.

8 A. I don't like to talk about work when I had my  
9 day. Definitely.

10 Q. Yeah. Okay.

11 A. So she know me the way I am so that the  
12 subject was in general about travel, food, and have a  
13 good time, yeah.

14 Q. Okay. And so and she drank alcohol that  
15 night?

16 A. Yes.

17 Q. And do you remember what she was drinking?

18 A. Sake?

19 Q. Was everyone drinking sake?

20 A. Not Eddie, because the time that he was, I  
21 think, sick. He got the problem with the --

22 Q. He was sick when he was there?

23 A. No, his health problem. He got healthy  
24 problems at the time. Very well. So he was very  
25 cautious with no alcohol at that time.

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1 Q. Okay. So Eddie wasn't drinking, but she was?

2 A. Yes.

3 Q. Any recollection of how many sakes she drank?

4 A. Not too many, because she don't like sake.

5 Q. Okay. Did she drink other things too?

6 A. No. That one, that was it.

7 Q. Okay. But that night she didn't seem  
8 intoxicated?

9 A. No, not at all.

10 Q. Okay. So you-all had a good time that night.

11 A. Very good.

12 Q. And then when was the next time that you got  
13 together either with Cynthia or with Eddie or with  
14 Eddie and Cynthia?

15 A. The next location was, I don't remember if it  
16 was the third time or the fourth time, but there was,  
17 we have before his birthday, it was, I think before or  
18 after his birthday, we have a party with Italians. We  
19 have a banquet dinner with Italians in the north side.  
20 And it was huge, around maybe 500 people was there at  
21 the time.

22 Q. 500?

23 A. Yes.

24 Q. Okay.

25 A. It was all Italians from north, south, north

1 east. They were meeting there and there were two  
2 banquet halls full of people.

3 Q. And that was also in 2019?

4 A. Yes. I invite Eddie Johnson because at the  
5 time when we went to the Korean restaurant, we  
6 exchanged phone numbers.

7 Q. Okay.

8 A. So I invite Cynthia and Eddie to enjoy with  
9 Italians in the north side.

10 Q. What's that event called? Is there name or  
11 something?

12 A. You know, the building is not anymore there.  
13 It's nexus, but I think was -- they would celebrate,  
14 they celebrate some few saints, like St Rocco Saint,  
15 Saint Joseph Saint. And so there was a dinner  
16 celebration for the celebrated Saint, you know, they  
17 celebrate somebodies from the south of Italy, Calabria,  
18 or the north side of Rome. The north side, yeah.

19 Q. Do you remember --

20 THE RECORDER: I'm sorry, the ending --

21 MR. LEONARD: The north side?

22 THE RECORDER: No, the end was a little  
23 mumbled.

24 THE WITNESS: I'm sorry, what?

25 THE RECORDER: After Calabria.

1 BY MR. LEONARD:

2 A. Calabria and from the north, the people from  
3 Rome, Italy, they were there celebrating.

4 Q. Do you remember what the name of the  
5 restaurant was?

6 A. No, I don't recall it.

7 Q. Do you remember what street or what area it's  
8 near?

9 A. North side around Harlem and Irving Park

10 Q. Okay. Like a big banquet hall type of place?

11 A. Oh, yes. It was huge. I don't remember the  
12 town on --

13 Q. On the west side of the street?

14 A. The west side of the street, yeah.

15 Q. Okay.

16 A. I don't remember the town next to area north.

17 Q. So when you saw Eddie and Cynthia at the  
18 Korean barbecue outing, you invited him to this  
19 upcoming Italian event?

20 A. Yes.

21 Q. And do you remember what month the upcoming  
22 Italian event was held in?

23 A. No, I don't remember if it was before or  
24 after his birthday.

25 Q. Okay.

1           A.     But I was -- his birthday's in July 28 and we  
2     got another event in July. And so definitely was after  
3     or before then.

4           Q.     Okay. Let's just talk about the Italian  
5     event first.

6           A.     Yes, sir.

7           Q.     So did you three go there together or they  
8     just meet you there at the Italian event?

9           A.     No, I arrived first and they arrived  
10    separately.

11          Q.     Any recollection of what time they arrived?

12          A.     The event was started approximately five. So  
13    they arrived at six, seven o'clock.

14          Q.     Okay. Do you remember, were they dressed in  
15    civilian clothes?

16          A.     Yes.

17          Q.     And do you know whether their -- your  
18    assumption would be their off duty?

19          A.     Yes.

20          Q.     Okay. And about how many hours did they  
21    stay?

22          A.     I think, the banquet, they stayed all night  
23    until I think midnight.

24          Q.     Okay.

25          A.     Because they closed and we leave all, you

1 know, at the same time.

2 Q. Did you sit at the same table?

3 A. Yes.

4 Q. Who else was seated at your table besides  
5 you, Cynthia, and Eddie?

6 A. All the Italian fellows. They were all  
7 Italian families. And --

8 Q. Like how big of a table are you sitting at?

9 A. Each table is approximately 12 people

10 Q. Okay. And Cynthia, based on your  
11 observations was having a very fun time?

12 A. Very good. Yeah. Very good.

13 Q. She was very talkative?

14 A. Yes.

15 Q. Was she seated next to Mr. Johnson?

16 A. Yes.

17 Q. Do you remember who was seated on the other  
18 side of her? Was that you on the other side?

19 A. Sometime it was me and sometime it was  
20 Franco, Gino, Luigi, CiCi. They were all the Italians.

21 Q. Do you remember any specific gentleman by  
22 first and last name who were at your table that night?

23 A. I'm sorry. I got lost.

24 Q. It's okay.

25 A. I'm sorry, what?

1           Q.    Do you remember the first and last names of  
2   any gentleman who were at the table with you that  
3   night?

4           A.    Oh, they were Gino Fantucci, Tony Aiello,  
5   Luigi Anasticia. They were all Italians.

6           Q.    Okay. Was Eddie a speaker that night or just  
7   a guest?

8           A.    No, he was a guest. He was invited.

9           Q.    Okay, he didn't speak or anything like that?

10          A.    He didn't. I translated for them.

11          Q.    Okay.

12          A.    Because I speak Italian, so I translated for  
13   the community. He wanted to give a speech to say,  
14   thank you for the invitation. It's in an honor for me  
15   to be here. So I was translated for Eddie Johnson.

16          Q.    Did he get up and speak to the whole group?

17          A.    Yes.

18          Q.    Or just to the -- okay, so, and how long did  
19   he speak for?

20          A.    Maybe two, three minutes.

21          Q.    Okay. So Eddie and Cynthia are at your same  
22   table with you for four or five hours?

23          A.    Yes, yes.

24          Q.    And Cynthia drank alcohol?

25          A.    Yes.



1 Q. Do you remember what she was drinking that  
2 night?

3 A. Vino, wine.

4 Q. Okay. Did she drink a lot of wine?

5 A. We all drank wine that night, so.

6 Q. You weren't noticing one way or the other how  
7 much?

8 A. Yeah, I didn't notice how much because we  
9 were all drinking wine.

10 Q. But it was fair to say, she seemed very  
11 happy?

12 A. Yes.

13 Q. Happy to be there?

14 A. Yes.

15 Q. Happy to be with Mr. Johnson?

16 A. Yes.

17 Q. And you watched their interactions, right?

18 A. Yes.

19 Q. And their interactions seemed very  
20 appropriate?

21 A. Yes.

22 Q. Cordial?

23 A. Yes.

24 Q. Professional?

25 A. Yes.

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1 Q. Lot of mutual respect back and forth?

2 A. Yes.

3 Q. Okay. Any public affection between the two  
4 of them?

5 A. Not at all. Not -- no -- no handshake,  
6 holding, kiss or anything. Nothing. Anything.

7 Q. Okay. But they did seat next to each other  
8 the whole night?

9 A. Yes.

10 Q. All right. And then did you folks go  
11 anywhere after the event together? Did you go any --

12 A. No. No.

13 Q. No after party, nothing like that?

14 A. Not -- not at all.

15 Q. Okay. And then you do remember attending  
16 Eddie Johnson's birthday party?

17 A. Yes. In July.

18 Q. In 2019. July.

19 A. Yes.

20 Q. Was that the one that Cynthia threw for him?

21 A. Yes.

22 Q. Okay. Did she -- during this time period,  
23 were you starting to text with her more often?

24 A. Yes. She's starting getting in contact with  
25 me to plan -- to plan, to -- to celebrate the -- Eddie

1 Johnson's birthday.

2 Q. Okay.

3 A. So and she asked me that, you know, "Do you  
4 know all these people who own restaurants, business,  
5 and -- you are party guy." So I told her, I said, "You  
6 let me know, what do you want to do?" I mean, say, "Can  
7 we say something with Italian restaurants or the  
8 Italian banquet? Because I want -- I don't want Eddie  
9 know, but I'm -- I'm preparing a birthday party for  
10 him." And all of a sudden then I -- I -- I suggest the  
11 Italian place. I suggest a French place because I have  
12 -- I speak French and I have French friends. And she  
13 said, "Ah, French is too expensive, too high, and we  
14 don't want to get something -- we wanted something that  
15 everyone can eat it." And I said, "Well, Italian, you  
16 can -- if they don't eat meat, they can eat pasta. If  
17 you don't want to eat pasta, they can eat salad." You  
18 know, it's -- so everything was -- everything was good  
19 and -- but then she changed her mind and then did it,  
20 birthday party, the building across the street of Navy  
21 Pier.

22 Q. Okay. So --

23 A. I forgot the name of the building.

24 Q. So you had a number of texts with her about  
25 her wanting to plan a party for Eddie.

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1           A.    Yes, she did it. She was planning and -- and  
2    -- and -- and she said at least, maybe hundred people.  
3    It's just for the party.

4           Q.    And did she explain why she wanted to throw  
5    this party for him?

6           A.    She say, because Eddie's a good guy. He's a  
7    special supervise -- boss, you know?

8           Q.    Okay.

9           A.    It's a -- and she used the word friend. He's  
10   a good friend.

11          Q.    Okay. So she made it clear it was her idea.

12          A.    Yes. It was her idea.

13          Q.    And -- and she really wanted this to be  
14   special.

15          A.    Yes.

16          Q.    And she was saying positive things about  
17   Eddie.

18          A.    All. Every time.

19          Q.    Okay. And how many -- about how many texts  
20   do you think you had with her leading up to the event?

21          A.    No texts, just conversations.

22          Q.    Oh, these are phone calls.

23          A.    Phone conversation.

24          Q.    Okay. And how many phone calls do you think  
25   you had with Cynthia leading up to Eddie's birthday

1 party that she threw for him?

2 A. Approximately three or four calls. Yeah.

3 Q. Okay. And during that period of time up to  
4 the party, were -- did you also -- when you had  
5 conversations with Cynthia, did you talk about things  
6 other than the birthday party? For instance, your own  
7 personal lives? Things like that?

8 A. Yes. Yes. Yeah.

9 Q. Did she -- during that period of time, summer  
10 of 2019, did she tell you anything about the status of  
11 her marriage or her children? Anything like that?

12 A. Not at all.

13 Q. Not at all.

14 A. Not at all.

15 Q. What would she -- when you weren't talking  
16 about the birthday party, what were the types of things  
17 she would talk about during those phone calls?

18 A. Same conversation. Travel, food, have a good  
19 time.

20 Q. And she seemed -- during that period of time,  
21 seemed very happy.

22 A. Yes.

23 Q. And very satisfied with her job.

24 A. Very well. Yeah.

25 Q. And very happy working for Eddie Johnson.

1 A. Yes.

2 Q. And very satisfied with her job.

3 A. Yes.

4 Q. And never claiming that there was anything  
5 that she was being forced to do, correct?

6 A. No. No, not at all. Not at all.

7 Q. Okay. All right. And so then did you -- you  
8 attended the birthday party?

9 A. Yes. Yes.

10 Q. Okay. And you're not sure if the Italian  
11 dinner we talked about was before or after that event.

12 A. Yes. I tried -- I don't remember exactly.

13 Q. The birthday party --

14 THE RECORDER: I'm so sorry.

15 BY MR. LEONARD:

16 Q. Go ahead.

17 A. No, I no -- I no recorded when it was before  
18 or after the birthday.

19 Q. Okay. The birthday party itself, were you  
20 there for -- for a number of hours?

21 A. Yes.

22 Q. About how many hours?

23 A. At least four hours.

24 Q. Did you go to -- I understand from some of  
25 the -- some of the testament, there was, like, a after

1 party after the birthday party. Did you go to that  
2 too?

3 A. No.

4 Q. Okay. And you were that night, again, able  
5 to observe and observe Cynthia interacting with Eddie?

6 A. Yes.

7 Q. And Cynthia seemed extremely happy that  
8 night?

9 A. Yes.

10 Q. Smiley?

11 A. Yes.

12 Q. Happy that she had put this event together?

13 A. Yes.

14 Q. Happy that Eddie was happy about it?

15 A. Yes, definitely. Yeah.

16 Q. Have you ever seen her happier than that  
17 night?

18 A. No. I mean, everyone was happy.

19 Q. Yeah.

20 A. Everyone. Myself, Eddie, Cynthia, and  
21 everyone, including the mayor, was there.

22 Q. Did you sit with -- with Johnson and Donald  
23 that night?

24 A. No, I was not on the table. I was on the  
25 table with the -- Cynthia Donald's parents. The -- the

1 mother.

2 Q. Okay. So Cynthia had her mother there?

3 A. Yes.

4 Q. And were there other members of her family  
5 that were sitting at your table?

6 A. The sister.

7 Q. Okay. Do you remember which sister?

8 A. No.

9 Q. Okay.

10 A. I don't recall.

11 Q. So you leave that night, and then if it -- if  
12 it -- if the Italian event occurred afterwards, then --  
13 then we already covered that. But going forward, after  
14 the birthday party, did you continue to have regular  
15 phone contact with Cynthia?

16 A. After that, few calls, but no, we didn't --  
17 we didn't meet at -- at all after -- after -- after the  
18 -- the -- the birthday party. Not at all.

19 Q. Okay. You didn't get together for dinner  
20 with her?

21 A. No. Not at all.

22 Q. Okay.

23 A. Not at all.

24 Q. So for what period of time did she continue  
25 to have phone contact with you? Like, how many --



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1 after the birthday party, did you talk to her, for  
2 instance, in August and September on the phone from  
3 time to time?

4 A. Yes. A few calls. Yeah.

5 Q. How often would you talk to her on the phone  
6 during that period of time?

7 A. Maybe four times. If that.

8 Q. Okay.

9 A. It was a few calls after that.

10 Q. Okay.

11 A. Few calls.

12 Q. Would sometimes she would call you and  
13 sometimes you would call her?

14 A. Yes.

15 Q. Do you remember what you would talk about?

16 A. Same thing. Food, travel, and all.

17 Q. Okay. But you didn't get to --

18 A. I -- sorry. That -- that time was also, too,  
19 my -- my furlough coming up. So during my furlough,  
20 it's in September, I take a 45-day full furlough, so I  
21 lost completely contact. So I'm sure that I don't talk  
22 to her --

23 Q. Okay.

24 A. -- for that period of time.

25 Q. So you kind of went off the map during your

1 furlough?

2 A. I like travel. I want -- I get out overseas  
3 for sure.

4 Q. Good. Good. Okay. And then during the  
5 months of August and then leading -- what was the date  
6 of your furlough? You remember?

7 A. September.

8 Q. Do you remember what date in September?

9 A. I'm a 10 period. So September 12, 15,  
10 probably, that year.

11 Q. Okay.

12 A. Yeah.

13 Q. So you would've had phone contact with her  
14 from late July after the birthday party up until the  
15 time of your furlough?

16 A. Yes. Yeah, yeah.

17 Q. Okay. And during that period of time, when  
18 you had phone calls with her, is it fair to say she  
19 continued to seem extremely happy?

20 A. Yes. Yeah.

21 Q. Happy with her -- how her life was going?

22 A. No complaints at all.

23 Q. Happy working for Eddie?

24 A. Yes.

25 Q. Would she talk about her work at all during

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1     those calls?   What she was doing?   That kind of thing?

2             A.     Not at all.

3             Q.     Okay.   And she continued to say good,  
4     positive things about Eddie?

5             A.     Yes.

6             Q.     Gave you the impression she was extremely  
7     happy still to be working with him?

8             A.     Yes.

9             Q.     All right.   So then you do the furlough and  
10    you're kind of off the map for 45 days.

11            A.     Yes.

12            Q.     And that takes us to -- does that take us to  
13    early November or late October?

14            A.     November.

15            Q.     November.

16            A.     Because it's 45 days.   So I'm back for --  
17    where -- I -- I think I -- I went to China that year.  
18    And Japan, Korea, too.   I went to there, too.   So I'm  
19    back, like, by the end of October.

20            Q.     Okay.

21            A.     Beginning of November.   Yeah.

22            Q.     All right.   And when you come back, then, do  
23    you have any contact in 2019, the rest of the year,  
24    with Cynthia or Eddie or the -- or the both of them?

25            A.     Not at all.

1 Q. Okay. Any particular reason why you weren't  
2 talking to Cynthia?

3 A. I tried to get in contact with them after  
4 November, because in -- they announced -- I -- I  
5 watched -- I was watching the news and they announced  
6 that Eddie Johnson was demoted.

7 Q. Okay. So you saw the whole thing where  
8 Lightfoot said that --

9 A. Yes.

10 Q. -- he was no longer the superintendent.

11 A. Exactly. Yes.

12 Q. Okay. In response to that, did you call both  
13 Eddie and Cynthia?

14 A. Both.

15 Q. Okay. But you didn't end up talking to them.

16 A. No.

17 Q. All right. And then we turned the page to  
18 calendar year 2020. Did you have any communications  
19 with Cynthia Donald?

20 A. The next communication I had with Eddie, it  
21 was approximately in February -- February 2020.

22 Q. Okay.

23 A. I was in an Italian restaurant having dinner  
24 with my friends at Macello's restaurant in the Lake  
25 Street in Racine, and I call Eddie and I invite him for

1 dinner. And I told him, I said, "Let's go celebrate.  
2 You retired." Because I think at the time he retired  
3 that time. He -- he came.

4 Q. Okay.

5 A. He came to the party.

6 Q. Did Cynthia show up at all that night?

7 A. No.

8 Q. Okay. Did you guys talk about his  
9 relationship with Cynthia at all that night?

10 A. No.

11 Q. Okay. And then did there come a time in 2020  
12 when Cynthia reached out to you?

13 A. Well, I called -- the -- they had dinner in  
14 the Italian restaurant. I called Cynthia. I invite  
15 first Eddie, then Eddie came, and there was my Italian  
16 friends, and then I called Cynthia.

17 Q. Okay. Nobody asked you to call Cynthia.

18 A. No.

19 Q. You decided. You decided to call.

20 A. I called -- I called Cynthia.

21 Q. Okay. And what were -- why did you want to  
22 have her come out that night?

23 A. Because I -- Eddie was there, I was there,  
24 and I was the impression everything was okay. So I  
25 invite. I invite her and she stated -- she answered,

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1     like, the open-ended questions. Like, okay. Yes. No.  
2     "Are you there?" "Yes." "Is Eddie here -- there?"  
3     "Yes." And I -- and I told her, "You want to come? You  
4     want to enjoy with us?" And she say, "I'm -- I'm -- I'm  
5     not -- right now I -- I -- I need to find a babysitter  
6     for my -- my baby." So she asked me, "Is Eddie there?"  
7     And I said yes. "Can I talk to him?" And I say, "Yeah,  
8     no problem." So I -- I pass my phone to Eddie and Eddie  
9     excuse himself for at least maybe three minutes and --  
10    and talked to her.

11           Q.    Okay. So on that night, you called Cynthia  
12    on your own. No one asked you to.

13           A.    No.

14           Q.    Okay. And Cynthia said she wanted to come  
15    out and meet you, but she had to get a babysitter.

16           A.    Find -- exactly. Yes.

17           Q.    Okay. She didn't say, "I don't want to  
18    come."

19           A.    No, no. She wanted to come to talk to Eddie.

20           Q.    Yeah. Got you. What I was saying is -- and  
21    -- and I know we've kind of covered this, but she did  
22    -- she doesn't say to you, "Oh, no, I don't want to  
23    come there because Eddie's there."

24           A.    No.

25           Q.    Right?

1 A. Not at all. No.

2 Q. It was the opposite.

3 A. The opposite.

4 Q. She's asking, "Is he there?"

5 A. Yes.

6 Q. And then she's asking, "Can I talk to him?"

7 A. Yes.

8 Q. And then she does talk to him.

9 A. And -- and then when Eddie come back, I  
10 asking him, "Is -- is she coming around?" And he say,  
11 "No, because she doesn't know --" sorry. "She doesn't  
12 know because she -- she need to look for a babysitter."

13 Q. Okay.

14 A. So she was willing to come if he would find a  
15 babysitter.

16 Q. Yeah. So no negative statements by her about  
17 Eddie?.

18 A. No.

19 Q. And in fact just the opposite. She said she  
20 wanted to come.

21 A. Yes.

22 Q. Okay. But she couldn't make it because the  
23 babysitter.

24 A. Yes.

25 Q. Okay. Now, going forward, did you continue

1 to have some communications with Cynthia in 2020 after  
2 that?

3 A. Yes.

4 Q. And do you remember when the next one was  
5 approximately?

6 A. I don't recall exactly the date. It was in  
7 March or April. Between March or April. She called me  
8 and she asking me a favor, if I can set a meeting with  
9 Eddie Johnson, and talk to about something. Something  
10 very seriously. So I told her, and I say, "You want me  
11 to call him to set a meeting when you -- you used to  
12 work for him? Why you no -- you no call him? You got  
13 --" so, "Oh, I cannot tell you. I cannot tell you on  
14 the phone what it's about, but I need to talk to him."  
15 So I -- I noticed it was weird, you know? So I told  
16 her, I say, "Okay, let me set out a meeting. See if he  
17 -- if he's willing to set a meeting." And I --

18 Q. Do you remember -- do you remember what month  
19 that was when she called you and asked you that?

20 A. Approximately, I think it was in March.

21 Q. Okay.

22 A. March that year, yeah.

23 Q. Okay. So did you -- did she -- and she  
24 wouldn't tell you why?

25 A. No.



1 Q. Okay. Did you eventually agree to see if you  
2 could set up a meeting?

3 A. Yes.

4 Q. So did you contact Eddie that same day?

5 A. He didn't respond.

6 Q. Okay.

7 A. I left a -- he didn't respond.

8 Q. Did you leave him a phone message or a text?

9 A. No, calls. Phone.

10 Q. And what'd you say in your calls?

11 A. No. I didn't leave a message. Only calls.

12 Yeah. Yeah.

13 Q. Oh, okay. Okay. So you didn't leave him a  
14 message.

15 A. No. Leave a message, no.

16 Q. Did you ever get the meeting set up?

17 A. No. That -- that time, no.

18 Q. Okay. So did you go back -- did you call  
19 back Cynthia and said, "I couldn't get ahold of him"?

20 A. Yes.

21 Q. And what'd she say?

22 A. "Try." Said, "Give him more calls. Find  
23 out."

24 Q. She wants you to try more.

25 A. Yeah.

1 Q. Okay. But you --

2 A. SO I told her again, I remarked, I said, "You  
3 got his cellular. Why you no call him?"

4 Q. Yeah. And what'd she say?

5 A. Say, "I cannot tell you. It's -- it's  
6 something very serious I cannot tell you about."

7 Q. Okay. So did you ever get that meeting  
8 together?

9 A. That time, no.

10 Q. Okay. What about -- what about in the  
11 future?

12 A. So then in -- it happened now with everything  
13 in March and April. Like, three -- three more calls.  
14 Cynthia called me again and -- and she say, "Can you  
15 call Eddie again?" And I say, "For what?" And she say,  
16 "I need to set a meeting with him." And I say,  
17 "Cynthia, you know, you got the cellular. You got to  
18 tell me what's going on." And, "No, I cannot tell you.  
19 So can you set a meeting in Indiana?"

20 Q. In Indiana?

21 A. Yes. So I -- I -- I thought it was Indiana  
22 Street, because I live in Chinatown, in Wentworth  
23 Street.

24 Q. Yeah.

25 A. And go to a dinner, to Italian -- in any one

1 Italian, in any restaurant in Indiana. So I say,  
2 "Indiana? There's no good restaurants in Indiana  
3 Street." So she stated -- and I'm apologizing. I'm --  
4 I will curse. She say, "No, fucking idiot. I'm  
5 talking about Indiana state."

6 Q. Okay. So she tells you she wants to set up a  
7 meeting with -- with Eddie Johnson in the state of  
8 Indiana.

9 A. Yes.

10 Q. Did she explain why she doesn't want it to be  
11 in Illinois or in Chicago?

12 A. I asking and she say -- she stated that,  
13 "It's just very serious. I need to talk to him in  
14 Indiana state, that nobody know who we are. Nobody  
15 will asking questions while we are there." And -- and  
16 -- and she told me, "And I know for sure that you know  
17 some people who own restaurants in Indiana." And I say,  
18 "Yeah, Café Borgia in Indiana, in Munster, Indiana.  
19 That's my friends, too. They're all Italians there,  
20 too." "Okay. Try to set the meeting in Indiana, in  
21 Indiana state. Indiana state," she remarked.

22 Q. Yeah. Yeah.

23 A. And I say, "Okay." And I tried to contact  
24 Eddie and -- and -- and he responded to me and he was  
25 like, "Indiana. Why Indiana?" "I don't have no idea.

1 This is between you guys. So I don't have no idea  
2 why."

3 Q. And did -- did they have the meeting?

4 A. Nope. They didn't have it.

5 Q. Okay. So did Eddie tell you he didn't want  
6 to go to Indiana or -- or did he give you a reason or  
7 what happened?

8 A. No. No reason. He was like, "Something is  
9 going on." But Eddie is, to me, he's my supervise. He  
10 was my superintendent. So he -- to me, it's like the  
11 -- the figure of my -- my -- my supervisor leave and I  
12 retired. So I respect his decision. I never question  
13 him.

14 Q. Yeah.

15 A. And I say, "Yes, sir. No, sir." You know.

16 Q. Yeah. So did you go back and then --

17 A. And he did it with me, too, because probably  
18 he treat me like I was a, you know, you know, a kind of  
19 P.O. or, you know, subordinate (sic), you know what I  
20 mean?

21 Q. So did you have to go back and call Cynthia  
22 and say, "Eddie doesn't want to meet in the state of  
23 Indiana"?

24 A. No, he didn't respond.

25 Q. Okay.

1           A.     That's what I told her. And I say -- and I  
2     say, "Why not?" And she say, "I don't know." She got to  
3     ask him.

4           Q.     Wait, so did you actually -- you told Eddie  
5     that she wanted to meet in the state of Indiana, right?

6           A.     Yes.

7           Q.     And then was he supposed to get back to you?

8           A.     Yes.

9           Q.     Okay. But he just didn't.

10          A.     He didn't. Yeah, yeah.

11          Q.     Okay. So when you told -- when you called  
12     Cynthia and said, "Eddie didn't get back to me," what  
13     did she say?

14          A.     She got upset.

15          Q.     Okay.

16          A.     She got very upset.

17          Q.     Like mad? Loud?

18          A.     Very, very upset.

19          Q.     Okay.

20          A.     Very frustrated.

21          Q.     So this call with her when she got upset,  
22     would that have been in March or April of 2020?

23          A.     Yes. The -- the April.

24          Q.     Okay. So you said, "Eddie hasn't responded  
25     about meeting in the state of Indiana." And just tell

1 me her tone of voice. Was it anger?

2 A. She was angry.

3 Q. Okay.

4 A. She was -- she was very frustrated.

5 Q. And did she say --

6 A. She was very upset.

7 Q. Did she say why she was upset or angry?

8 A. Yeah. She -- I -- I ask and I say, "Okay, we  
9 got to, you know, finish this -- this -- this -- this  
10 drama," I told her. I said, "Because I don't like  
11 getting involved with this." So --

12 Q. Did you say, "finish this drama?"

13 A. Yeah.

14 Q. Yeah.

15 A. The you call me, the I call you, the you want  
16 me get involved with this and that. So she got upset  
17 and she stated, "You don't have no idea what all the  
18 shit I'm going through right now." And I said, "I don't  
19 understand. What do you mean?" And -- and she stated,  
20 "You don't have no fucking idea what I'm going  
21 through." And -- and -- and she say, "I'm very fucking  
22 --" sorry, I'm apologizing, but that's the way -- I'm  
23 not curse at all. I apologize. Yeah. "You don't have  
24 no fucking idea what I'm going through with this  
25 situation." And, "What situation you're talking about?"

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1 And she say the -- the -- the -- that she got a hard  
2 time. They tried to meet Eddie for something very  
3 serious happened. And -- and -- and -- and she start  
4 talking me, "I want to talk to him and I want to sit  
5 down and discuss about this -- this problem and this  
6 situation." And I say, "Okay. You don't want to tell  
7 me what it's about." So I told her, and I say, "So what  
8 are you -- what are you planning to do? What do you  
9 want to do?" And she stated that to me, that -- she was  
10 so upset, and she used the word compensation. She say,  
11 "I should get compensated for all the shit I'm go  
12 through for." Compensated.

13 Q. Wait, so she said -- Cynthia now said she  
14 wanted you to get compensated?

15 A. No, her.

16 Q. Okay.

17 A. Right? I'm talking in first person so I'm  
18 telling you.

19 Q. Okay. So she says, "I want to get  
20 compensated."

21 A. Yeah.

22 Q. Okay.

23 A. "I should get compensated for all the shit  
24 that I'm going through." And I stated, "Compensated?"  
25 "Yeah. I should be getting some compensation. I

1     should get some six figure numbers for what I'm all  
2     going through."

3           Q.     Okay. Did she --

4           A.     Didn't mentioned the money --

5           Q.     Okay, hold on --

6           A.     Didn't mentioned there word money, but she  
7     said six figure.

8           Q.     So -- so -- hold on. So she said -- so she  
9     said -- "I should be --" Cynthia now says, "I should be  
10    getting six figure compensation for what I'm going  
11    through."

12          A.     Yes.

13          Q.     And was she telling you who she thought  
14    should pay her the six figure compensation?

15          A.     No. No.

16          Q.     Okay.

17          A.     She didn't say that.

18          Q.     Did you -- did it seem like she was saying it  
19    was Eddie Johnson that should pay her?

20          A.     No.

21          Q.     Okay. Did she tell you what the problem was  
22    that she should be compensated for?

23          A.     Not at all.

24          Q.     Okay. Did she say that you should get  
25    compensated if you help her?



1           A.    No, not to me, no.  No.

2           Q.    Okay.  Okay.  And so when you -- when she  
3   tells you that -- on -- during this phone call, that "I  
4   should get six figure compensation for what I'm going  
5   through," did you say, "For what?"

6           A.    Yes.

7           Q.    And what --

8           A.    And she didn't go too in details.  And then  
9   -- and I -- I -- I -- I -- I told her, I said, "You're  
10  -- you're losing your mind.  You really -- are you  
11  seriously or are you -- are you joking with this?"

12          Q.    Yeah.

13          A.    And -- and she stated that, you know, "I, you  
14  know, I would -- I -- I want to make sure that if you  
15  help me, I will take care of you, because you're a good  
16  guy.  But they're taking advantage of you.  You don't  
17  have no family here.  They're always calling you an  
18  immigrant.  They don't give a shit about your  
19  education.  They don't give a shit about all you  
20  language you speak.  So I'm planning to, you know, for  
21  sure to get it promoted -- a promotion to meritorious  
22  sergeant." And I say -- I say, "What?" And I --

23          Q.    She -- she said that she wants to get  
24  promoted or she wants you --

25          A.    Yes.

1 Q. Okay.

2 A. No, she want to get her.

3 Q. Okay.

4 A. "I will make sure that we'll get it promoted,  
5 a meritorious sergeant. And I'm going too far to make  
6 it's a lieutenant meritorious promotion." And I say,  
7 "Cynthia, you're losing your mind. Why are you doing  
8 this? What are -- what -- what are you talking about?"  
9 And she went to, "You don't have no idea what the fuck  
10 is going on. And -- and believe me, it will be enough  
11 -- enough money for everyone." That's exactly what she  
12 say. And she say, "I know your father is very sick. I  
13 know your father got Alzheimer and it will be enough  
14 money for take care of him."

15 Q. Okay. So let's just break that down. So  
16 first of all, she's telling you that she should get six  
17 figure compensation for what she's been through, right?

18 A. Yes.

19 Q. But she's not telling you what she's been  
20 through.

21 A. Yes.

22 Q. Okay. Then she's telling you that she should  
23 also become a sergeant and a lieutenant because of what  
24 she's gone through.

25 A. Meritorious. Yeah.

1 Q. And you're saying that's --

2 A. She was seeking to promoted meritorious for  
3 sergeant.

4 Q. Yeah.

5 A. As far as lieutenant.

6 Q. Yeah. So -- and she's saying that she should  
7 be promoted those positions because of what she's been  
8 through.

9 A. Yes.

10 Q. And you're saying, "That's crazy."

11 A. "You lose your mind."

12 Q. Yeah. Okay.

13 A. That's what I -- exactly what I say to her.

14 Q. Okay. And then she's saying to you that if  
15 you help her, she's going to take care of you.

16 A. Take care of my father.

17 Q. Yeah. Okay.

18 A. Because my father is suffer Alzheimer.

19 Q. But she -- but she starts off by saying if  
20 you help her --

21 A. There will be enough money --

22 Q. Yeah. Hold on. Hold on. Which we're going  
23 to go through. I know you already said this. I got to  
24 break it down. But she starts by saying that if you  
25 help her, she's going to take care of you, right?

1           A.     Yes.

2           Q.     And then she says the things about your  
3     father and says she's going to get enough money that  
4     she can pay for your father's care.

5           A.     Yes.

6           Q.     Okay. Did she tell you how much money she  
7     might want to give you?

8           A.     No.

9           Q.     Okay. So in your mind, she's clearly making  
10    an offer to you that if you help her in whatever this  
11    endeavor is -- you don't even know what it is yet --  
12    she's going to see that money goes to you for your  
13    benefit, money out of her pocket, to care for your  
14    father.

15          A.     Absolutely. Yeah.

16          Q.     Okay. Did she tell you how much she might  
17    give you to care for your father?

18          A.     No.

19          Q.     Okay. Sort of like -- not sort of like, but  
20    basically a bribe to help her with something. Right?

21          A.     Well, she -- she continued the conversation  
22    and say the -- "If I make lieutenant meritorious," her,  
23    I'm talking about first person, "I will take care of  
24    you. I will -- I will helping you to go promoted." And  
25    I say, "I don't need it. I mean, I don't know what are

1     you talking about."

2           Q.     Okay.  So hold -- I'm going to stop you  
3     there.  Okay.  So she tells you that if she gets these  
4     promotions for herself, not only will she give you  
5     money to care for your father, but she'll get you  
6     promoted, too.

7           A.     Yes.

8           Q.     Okay.  So basically, even though you don't  
9     know what she's going to -- what the purpose is, she's  
10    essentially trying to bribe you with a promotion and  
11    money for your father, right?

12          A.     That's right.

13          Q.     Okay.  And then what did she say next?

14          A.     So I -- I told her -- she got frustrated and  
15    more angry because I told her and say, "I'm not getting  
16    involved with this.  I don't want you to call me for  
17    this." And then she started, "You're a stupid fucking  
18    idiot.  You are like an old school guy, loyal and  
19    honor, honor to the dead.  You are too loyal to him."  
20    And I say, "No, that's not -- that's not about loyalty  
21    and honor.  It's about the truth." I told her and I  
22    say, "This is not right.  This is not right what are  
23    you doing." And I -- and she said, "You're a fucking  
24    idiot.  You will be in the bottom for the rest of your  
25    career because you are a fucking idiot that you don't

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1 want it. This is the change, the opportunity for make  
2 changes in your life. They're treating you like a  
3 shit. They're treating you with no respect. They're  
4 treating you like a fucking immigrant. And again, I  
5 told you, nobody give a shit about your education.  
6 Nobody give a shit about you, your training, your  
7 experience, your -- nothing at all. And this is the  
8 opportunity you make changes in your life." And I told  
9 her and say, "I'm not going to do anything you now say  
10 about, talking about, because this is not right. You  
11 understand that? This is not right. This is -- this  
12 is all lines," I told her and I say. "This is all  
13 about lines, you know?" And -- and then she hang it up.

14 Q. Okay. So is it fair to say when she offered  
15 you the bribe of giving you money to care for your  
16 father in exchange for helping her, you were offended?

17 A. Oh, yes. Definitely.

18 Q. And when she offered you a bribe --

19 A. Broken.

20 Q. Yeah. When she --

21 A. I was broken.

22 Q. Yeah.

23 A. Broken heart.

24 Q. And when she offered you a bribe of a  
25 promotion to a higher position within CPD, you were

1 likewise offended?

2 A. It is. Yeah.

3 Q. And you also thought she's a little bit crazy  
4 thinking that she can give out promotions to people.

5 A. Well, she stated -- I don't remember if it  
6 was that conversation or later. I got one more  
7 conversation. She stated the -- the -- the -- I told  
8 her and I said, "Where do you get this idea that you  
9 will get promoted meritorious?" And she stated, word by  
10 word, she stated, she say, "The city always do that.  
11 The city always settle and make promoted people for do  
12 the cover. All the -- the shit's going on. So sooner  
13 or later I will settle this with the promotion  
14 meritorious because the city always do that. It  
15 happened before in the past, and it will happen today,  
16 and it will happen tomorrow." That -- that -- that's  
17 exactly what she said.

18 Q. Okay. So either that -- during the  
19 conversation we're just talking about, or a subsequent  
20 telephone conference, she tells you that she'll settle  
21 whatever claim she has, and they're going to promote  
22 her to these positions, and therefore she'll be able to  
23 promote you.

24 A. That's exactly what she said.

25 Q. Okay. So during the first call, she said all

1 those mean and angry things to you. Did you end up  
2 hanging up? How'd the call end when she said all that  
3 --

4 A. She hanging up when she called me the -- the  
5 -- I was an old school honor and loyalty fucking idiot.  
6 Even, you know, there was too loyalty to "him".

7 Q. Yeah.

8 A. She didn't mention the name.

9 Q. Yeah.

10 A. To "him".

11 Q. Yeah.

12 A. I assume that was Eddie.

13 Q. Yeah. So when --

14 A. "You're too loyalty to him that you have this  
15 honor, this co-honor and loyalty." Exactly that word.  
16 "You have this old school co-honor or loyalty. You are  
17 too honored to him, too loyalty to him.

18 Q. Okay. So even though you didn't know what  
19 she was going to ask you to do, from what she was  
20 saying, it was clear to you that she was meaning you  
21 needed to do something against Eddie Johnson?

22 A. Yes.

23 Q. Okay. And you obviously turned her down?

24 A. Definitely, yeah.

25 Q. Yeah. Then did she try again? Did she call



1     you and try again?

2           A.     Yeah, she did.

3           Q.     Okay. And when did she try to bribe you on  
4     the second occasion? How many days went by?

5           A.     February, March. Maybe around April.

6           Q.     Okay. So we're in April --

7           A.     April, yeah.

8           Q.     -- of 2020.

9           A.     April, yeah.

10          Q.     And then you've already turned down her  
11     bribe, how much -- how many days or weeks had gone by  
12     since you had turned down her bribe?

13          A.     Okay. This is -- and I don't know if it's  
14     important or not, but in April she -- she called me  
15     four or five times from different phone numbers.

16          Q.     Okay.

17          A.     Okay. How I found that, because I normally  
18     -- I never answer the phones that I don't recognize. I  
19     let people leave a message or send me a text. So I  
20     didn't recognize this phone number. So finally, one  
21     day I answered one these calls. And I say, "Cynthia,  
22     why do you call me with all these different phone  
23     numbers?" I challenged. "Oh, you don't have no idea.  
24     They -- they're -- they're watching me, they're  
25     checking me, they're follow me." And I say, "Who's

1 watching you? Who's checking you? Who's following  
2 you?" I told her, I say --

3 Q. What -- what -- when you asked her that  
4 question, what'd she say? Did she -- did she say who  
5 it was that was allegedly following her or watching?

6 A. No. No.

7 Q. Okay, no.

8 A. She never stated. I told her, I said, I was  
9 disappointed and upset that you call me five, four --  
10 four or five different phone numbers. And I don't  
11 recognize the number and you know the way I am. And  
12 then she stated that "They're following me, they're  
13 checking me." And -- and then I told her and I said,  
14 "so what happened with your phone? The original  
15 phone?" And she said, "I destroy it."

16 Q. Okay. So --

17 A. She used that word, "I destroy it".

18 Q. Okay, so hold on. I'm going to break that  
19 down. So you know, you told us in detail about her  
20 attempt to bribe you with money for your father and  
21 this promotion she was going to get you. The -- the --  
22 the various calls, where she's using the different  
23 numbers, did they all occur before the call where she  
24 made the bribe offer? Like what -- what -- these --  
25 these calls she's making to you know, from the four or

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1 five different numbers, were they before she offered  
2 you the bribe or after?

3 A. After.

4 Q. Okay. All right, so --

5 A. Because she changed the phone number.

6 Q. Okay --

7 A. Yeah.

8 Q. -- so let's look at this timing. So -- so  
9 you have the call where she makes the bribery attempt  
10 on you turn down, she says all the mean things to you,  
11 and then after that is when she starts calling you from  
12 different phone numbers?

13 A. Yes.

14 Q. Okay. What number was she calling -- what  
15 number did you have that she was calling?

16 A. No -- no recall.

17 Q. Do you have the same cellphone as you did  
18 back then?

19 A. Yes -- yes. Always.

20 Q. Same number?

21 A. Yes.

22 Q. Can -- can I ask you what -- we can put this  
23 in protected status on the deposition. What's that  
24 number?

25 A. My --

1 Q. Yeah.

2 A. REDACTED REDACTED REDACTED

3 Q. Is that a personal cellphone or --

4 A. Yes.

5 Q. -- is that a -- that's not a CPD?

6 A. No.

7 Q. Okay. And so when she'd make calls to you  
8 to, text you or phone call you, is it fair to say she  
9 would always call that number?

10 A. To my numbers, yes.

11 Q. Who's your -- who's your carrier? Sprint or  
12 who -- who is your --

13 A. Oh, I have a Chinese, British corporation.  
14 It's -- it's -- so it's a --

15 Q. Is it -- is your -- is your phone number  
16 under your name or a company's name?

17 A. My name. My name. Yeah.

18 Q. Okay. And, we can put this under protective  
19 status, for -- for -- if we tried to get a subpoena to  
20 get those phone calls to show how many times she called  
21 you, is that -- is it under your name? Like, does it  
22 say "Claudio Salgado" and your address?

23 A. Yes. On the phone, yeah. I believe so,  
24 yeah.

25 Q. Okay. And what address is listed with that

1 account?

2 A. The -- the only thing is, my -- the account  
3 is in China or British account, because I ordered when  
4 I was in Europe.

5 Q. Okay. Meaning -- but when you get a bill for  
6 that account, is it -- is it electronic, with the log  
7 in, you see all the call --

8 A. Yes. Yeah. With the name, my name, yeah.

9 Q. Okay. Can you get those old phone bills, do  
10 you think?

11 A. Well, that's when the thing like me travel  
12 around the world, that will be taking a long time to  
13 get all that maybe.

14 Q. Okay. Okay. But you have --

15 A. I not a common, regular guy with AT&T and --

16 Q. That's okay. Okay, well, let's just break  
17 this down. So you have the call where she tries to  
18 bribe you say no, she says all the horrible things  
19 against you, and then she starts calling you from four  
20 or five different numbers?

21 A. Yes.

22 Q. And then you ultimately have the conversation  
23 with her where you answer and it's her. And you ask  
24 her why she's been calling you from these different  
25 numbers.

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1           A.     Yeah, because she stated, "they follow me,  
2     they're checking me, they're looking for me" and I say,  
3     "who is looking for you?"

4           Q.     And what'd she say?

5           A.     And she say, "No, I don't want to tell you."

6           Q.     Okay. Now, during this call, does she again,  
7     try to bribe you?

8           A.     No. At the time -- the only thing which she  
9     said at the time -- no, at that time, no. The -- the  
10    -- I asking about her phone number, her phone, the  
11    original phone. She said, "I destroyed the phone".  
12    Destroyed. And used the word, "destroyed".

13          Q.     Okay, hold on. So she's calling you from  
14    these different numbers. You eventually answer, she  
15    tells you that people are "watching me, following me,"  
16    right? And then you say, "what happened to your old  
17    phone?"

18          A.     Yes.

19          Q.     And what'd she say?

20          A.     "I destroyed it."

21          Q.     Okay. Did she tell you why she destroyed it?

22          A.     Nope. She said -- I asked it and say, "Who  
23    -- why you did it? Who tell you to do it?" "Nobody. I  
24    destroyed it."

25          Q.     Okay.

1           A.    It's a quote, that's what she says, "It's a  
2   lot of shit in that phone."

3           Q.    That's what she said?

4           A.    That's what she say.

5           Q.    Okay.  So she said she destroyed her phone,  
6   herself, intentionally, right?

7           A.    That's what she said.

8           Q.    And she said, "There's a lot of shit on that  
9   phone"?

10          A.    Yes.

11          Q.    Meaning that she doesn't want anyone to see  
12   it?

13          A.    I guess.  Yeah.

14          Q.    Okay.  And this call, this would've been, you  
15   think April of 2020?

16          A.    Yes, I remember, yeah.

17          Q.    Okay.  And then what was the purpose of the  
18   call?  What she's -- is she asking you to do something?  
19   She, again, trying to bribe you?

20          A.    If I had changed my mind.  This was the  
21   words.

22          Q.    She asked you if you changed your mind.

23          A.    Yeah.

24          Q.    Okay.

25          A.    If I gave a -- if I give a second thought.

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1 Q. Okay, so she's calling you again. She had  
2 called you on numerous phones, and you would finally  
3 answer?

4 A. Yeah.

5 Q. Okay. And then she asked you, had you  
6 changed your mind about the bribery she had suggested  
7 before?

8 A. Yes.

9 Q. Okay. And you -- what'd you say?

10 A. No, I say, "I'm not change my mind. You're  
11 lying." And I told her, I say, "You're not telling the  
12 truth."

13 Q. Okay. Did -- by that point in time, did you  
14 -- by the time you had this call where she had called  
15 you from these different numbers, and then you finally  
16 answer and you discussed how she had destroyed her own  
17 phone and all that, by that time, was it already public  
18 knowledge that she was claiming that Eddie Johnson had  
19 done something to her?

20 A. No, I think it came out in October or  
21 November that year.

22 Q. Okay. So you still didn't know.

23 A. The allegation of mixed -- no.

24 Q. Even though she's trying to bribe you don't  
25 know what she wants you to say?



1 A. Yes.

2 Q. Okay. But you want no part of this?

3 A. Not at all.

4 Q. Yeah. And you're still offended by her?

5 A. Of course. Yeah.

6 Q. Okay. And when you say "No, I haven't  
7 changed my mind," what did she say?

8 A. Same thing that "You are fucking idiot.  
9 Stupid."

10 Q. Okay. She again calls you a fucking idiot.

11 A. Yeah. Yeah.

12 Q. And saying you're stupid for not going into  
13 whatever scheme it was, not doing her scheme.

14 A. Cynthia like to curse a lot when she's upset.

15 Q. Okay.

16 A. It's the truth.

17 Q. But she's yelling at you again.

18 A. So she's yelling me and treat me like yeah...

19 Q. Okay. And she wouldn't tell you what the  
20 scheme entailed?

21 A. No.

22 Q. Okay. Was that the last conversation or were  
23 there more?

24 A. No, she called me again another different  
25 phone number.

1 Q. Okay. And when was that?

2 A. Well, she -- she -- she warned me, she say,  
3 "Listen -- " she say, "Listen, idiot." Because she just  
4 got to call me idiot.

5 Q. Okay. So she calls you again and says -- are  
6 we now into May or is it later?

7 A. Yeah, she -- she say, "Listen, idiot."

8 Q. No, hold on. I just want to figure out what  
9 month this call --

10 A. I would say in-between April and May. May,  
11 May. It was close to my birthday. May 7th.

12 Q. Okay.

13 A. Now I remember, yeah.

14 Q. Was it on your birthday?

15 A. No, no, no. It was close to my birthday.

16 Q. And so she calls your cellphone again?

17 A. Yes.

18 Q. And you -- did you know what -- did you know  
19 it was her calling?

20 A. No. But she -- she -- she wanted me before,  
21 that, "Listen -- " now I'm idiot, she call me call  
22 idiot. "I will call you with different phones. So  
23 answer the fucking phone because it's me."

24 Q. Okay.

25 A. So I assume that was her at the time.

1 Q. Okay. So you -- so it's around sometime  
2 before your birthday in early May of 2020?

3 A. Yes.

4 Q. You pick up.

5 A. Yes.

6 Q. What'd she say?

7 A. She asking me if I can find a place for rent  
8 at Chinatown.

9 Q. Okay. So she asks you if you can find  
10 somewhere she can rent in Chinatown.

11 A. Yes.

12 Q. Does she say why?

13 A. Well, I live in Chinatown. I live at 2414  
14 South Princeton in Chinatown. So I know the  
15 neighborhoods, I know the area. So she say that she  
16 would like to find a place in Chinatown because Chinese  
17 people they're very private. They don't get involved  
18 with anything. So she want to find a place that she  
19 can have privacy. That nobody follow her or looking  
20 for her or asking for her. And -- and I say, "I'm not  
21 sure if he -- I can found a place for you here, for the  
22 cost of the money." Rent in Chinatown is very high.

23 Q. Does she say what all happened with her  
24 husband or her children, or anything like that?

25 A. Yes.

1 Q. What she say?

2 A. She -- she was told me that she got some  
3 issues with her husband.

4 Q. Did she say what the issue with the husband  
5 was?

6 A. Divorce. Divorce issues.

7 Q. She said that -- did she say that she had  
8 filed or she -- they were going to --

9 A. No divorce issues only

10 Q. She said, "We have divorce issues."

11 A. Yes.

12 Q. Okay. Did she explain any further?

13 A. No.

14 Q. Okay. What about her children?

15 A. No. Didn't say.

16 Q. Okay. And so did you say you'd look into  
17 whether you could get her a rental?

18 A. Yeah. I told her, I say "That would be hard  
19 to find for -- for you here in Chinatown."

20 Q. And why'd you say that?

21 A. Because Chinese people, normally, they like  
22 to stick together. Chinese people, there -- normally  
23 look for another Chinese people rented. Why I live in  
24 there, when I arrived there in 2007, I bought the  
25 property. Chinatown used to be all Italians before.

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1 You know? All there of Chinatown, Bridgeport, there's  
2 still some Italians there. So I landed that time  
3 because there were some Italians, and it was -- that's  
4 what I -- but now all my neighbors, they're all  
5 Chinese. They're all -- so I told her, I say, "Today's  
6 day, it's very hard to find one -- it's -- it's very  
7 high cost to rent in Chinatown. Number two, you're not  
8 Chinese. There would be like an issue. How you can  
9 find somebody not live Chinese.

10 Q. And so did she say -- did -- did -- was the  
11 subject then dead? Did you say it doesn't make sense,  
12 or how -- how -- how --

13 A. Yeah, that was -- that was dead. That was  
14 it.

15 Q. Okay. And did the conversation end?

16 A. Yep.

17 Q. Any discussion -- any further discussion  
18 about what she had said before, the bribery attempts,  
19 anything like that?

20 A. No.

21 Q. Okay. Was that the last communication you  
22 had with her, or was there more?

23 A. Yes.

24 Q. No -- no more?

25 A. No. Until I hear the news, she appeared in

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1 the news for the allegation of sexual assault, and that  
2 was it.

3 Q. Okay.

4 A. I never talked to her again.

5 Q. Okay. And then when you heard her public  
6 allegations about alleged sexual assault, you were able  
7 to kind of put two and two together.

8 A. Yes.

9 Q. And understand that the bribery she was  
10 offered was you to say things about Eddie Johnson.

11 A. Sadly? Yeah. Sadly and disappointment and  
12 broken.

13 Q. Yeah. Okay.

14 THE RECORDER: I'm sorry, repeat that.

15 THE WITNESS: It was sad, it was very  
16 disappointment, and it was very, very broken heart.

17 BY MR. LEONARD:

18 Q. Okay. And did she -- do you know -- did she  
19 try to make any further contacts with you?

20 A. Not At all. That was it.

21 Q. Okay. Okay. I don't any further questions  
22 for you at this point. Other attorneys might have some  
23 follow ups.

24 MR. MCLAUGHLIN: All right, I want to take a  
25 quick five minute break, and then I'll ask my

1 questions.

2 THE RECORDER: Off the record at 11:16 a.m.

3 (Off the record)

4 THE RECORDER: Back on the record, 11:25 a.m.

5 CROSS EXAMINATION

6 BY MR. MCLAUGHLIN:

7 Q. Sir. Are you related to a Carina Salgado?

8 A. No.

9 Q. What about a David Salgado?

10 A. No, sir. I no have no family here, sir.

11 Q. Okay. You have no relatives that are --

12 A. In United State of America, no.

13 Q. No relatives that are on the CPD then?

14 A. No, sir.

15 Q. Have you ever read the rules and regulations  
16 of the Chicago Police Department?

17 A. Yes, sir.

18 Q. And you're familiar with those rules and  
19 regulations?

20 A. Yes. I'm familiar with those.

21 Q. Have you ever violated any of those rules and  
22 regulations?

23 A. Yes.

24 Q. Which ones?

25 A. Lack of procedures.

1 Q. What can you tell me about that?

2 A. I was -- I was a DUI traffic guy for almost  
3 two years, and my English grammar is not too very good,  
4 so it took him a little bit more -- I -- I did it like  
5 -- when I was a DUI traffic guy, I was like doing three  
6 or four DUIs a week. So it took me a long time to  
7 finish my DUI arrest report. And so the person who was  
8 in custody, it took too long that they're in custody.

9 Q. Any other times that you remember violating  
10 the rules and regulations of the CPD?

11 A. No I don't.

12 Q. What happens if a police officer violates a  
13 rule or regulation of the CPD?

14 MR. LEONARD: Objection. Hypothetical.

15 Calls for speculation, lacks foundation.

16 BY MR. MCLAUGHLIN:

17 Q. You can answer.

18 A. Can I answer?

19 Q. Yeah.

20 A. All right. Sorry, what was the question?

21 Q. Yeah. What happens if a police officer  
22 violates a rule or regulation of the CPD?

23 A. Well, depending. He can get it -- he can be  
24 suspended, can you be CPAR'd, can you be fired, or he  
25 can be also to counseling. Counseling letter is the



1     basic start. And then go to upgrade.

2           Q.     Do you agree that if you are found to have  
3     violated a rule or regulation of the CPD, that you  
4     should be suspended or fired?

5           MR. LEONARD:   Objection.

6           MS. WOYTOWICZT:   Objection.

7           MR. LEONARD:   Lacks foundation, calls for  
8     speculation. Hypothetical that covers, who knows? Any  
9     -- any number of unknown situations.

10    BY MR. MCLAUGHLIN:

11           Q.     You can answer.

12           A.     I'm sorry. What was the question?

13           Q.     Yeah. Do you believe that if you yourself  
14     violated a rule or regulation of the CPD, that you  
15     should be suspended or fired?

16           A.     Yes, sir.

17           Q.     All right. You described Eddie Johnson as  
18     quote, "A very good man, and a -- " quote, "Good guy,"  
19     correct?

20           A.     Yes, sir.

21           Q.     Are you aware of what Eddie Johnson does in  
22     his free time when he is not on duty?

23           A.     No.

24           Q.     Are you aware of whether or not he's ever  
25     laid hands on a woman?

1 A. No.

2 Q. Would that surprise you if he did?

3 A. Yes.

4 Q. Were you aware that he choked his ex-wife on  
5 at least one occasion?

6 MR. LEONARD: Objection. Lacks foundation  
7 calls for speculation. Mischaracterization.

8 THE WITNESS: Yes. I would be surprised.

9 BY MR. MCLAUGHLIN:

10 Q. So in this case, the fact that Eddie  
11 Johnson's ex-wife testified under oath, that at least  
12 on one occasion, Eddie put both of his hands around her  
13 neck, choked her and threw her down to the ground, that  
14 would surprise you?

15 A. Yes, sir.

16 MR. LEONARD: Objection, lacks foundation,  
17 calls for speculation.

18 BY MR. MCLAUGHLIN:

19 Q. You didn't know about that until just now?

20 A. Yes, sir. To -- to the news.

21 Q. It's news to you right now that I'm telling  
22 you that, correct?

23 A. That correct. Yes.

24 Q. Does that change your opinion about Eddie  
25 Johnson?

1 MR. LEONARD: Objection. Lacks foundation.

2 Hypothetical. No basis to answer.

3 BY MR. MCLAUGHLIN:

4 Q. Go ahead.

5 A. No, it's not change at all.

6 Q. Okay. So you still think he's a, quote,  
7 "Very good man, and a good guy," even though on at  
8 least one occasion, he choked his ex-wife and threw her  
9 to the ground?

10 MR. LEONARD: Objection. Lacks foundation  
11 calls for speculation. Object to the hypothetical.  
12 Witness has no basis to answer.

13 Q. Go ahead.

14 A. It's lack foundation. Is no evidence or  
15 proof.

16 Q. Oh yeah. I'm telling you that she testified  
17 to that, under oath.

18 A. I still believe that he's a good guy.

19 Q. How many times in your opinion, can a man  
20 choke out a woman and still be a good guy?

21 MR. LEONARD: Objection. Lack foundations,  
22 calls for speculation. Object to hypothetical.

23 THE WITNESS: How many -- it's -- it's --  
24 wrong. What you statement is wrong.

25 BY MR. MCLAUGHLIN:

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1 Q. So is your testimony that you can still be a  
2 good guy and a very good man if you choke out women?

3 A. Yes.

4 Q. And were you aware that Eddie's current wife,  
5 Nakia Fenner reported to the CPD that Eddie battered  
6 her at least three times?

7 A. Yes.

8 Q. You are aware of that? Go ahead.

9 A. Yes.

10 Q. What do you know about those three batteries?

11 A. It's in the news.

12 Q. All you know about it is that it was reported  
13 in the news?

14 A. Yes, sir.

15 Q. So given that Eddie's ex-wife testified under  
16 oath that he choked her, that Eddie's current wife told  
17 the CPD that he's battered her at least three times,  
18 still, it's your testimony that Eddie is a good guy and  
19 a very good man?

20 A. Yes, sir.

21 Q. And you said that basically all you are, is a  
22 yes man to Eddie Johnson, right?

23 A. Yes.

24 MS. WOYTOWICZ: Objection. Misstates  
25 testimony.

1 BY MR. MCLAUGHLIN:

2 Q. Go ahead. Go ahead.

3 A. Yes, sir.

4 Q. And that's basically what you would say to  
5 Eddie, is "Yes, sir. No, sir." Correct?

6 A. Yes, sir.

7 Q. In this case, when Eddie Johnson asked you to  
8 testify on his behalf, was that your response? Yes,  
9 sir?

10 MS. WOYTOWICZ: Objection, lacks foundation.  
11 This states --

12 MR. LEONARD: Objection to foundation for  
13 Eddie Johnson asked him to testify.

14 BY MR. MCLAUGHLIN:

15 Q. Go ahead.

16 THE RECORDER: I'm sorry. What was that  
17 objection?

18 MS. WOYTOWICZ: Foundation lacks, misstates  
19 testimony.

20 THE WITNESS: Well, I was subpoena, and this  
21 is the right thing to do.

22 BY MR. MCLAUGHLIN:

23 Q. Yeah. So how many times did you talk to  
24 Eddie Johnson about giving testimony in this lawsuit?

25 A. Only one.

1 Q. And what did you tell him?

2 A. That I have been subpoenaed for do my -- my  
3 statement.

4 Q. And what did you tell him you were going to  
5 testify about?

6 A. Not at all.

7 Q. So there's been answers to interrogatories  
8 filed in this case with a lot of detail about what you  
9 were going to testify about. Who did you talk to  
10 before this deposition, besides the lawyers from City  
11 of Chicago, to tell them what you were going to testify  
12 about?

13 A. No one.

14 Q. Well, there's a interrogatory answers here  
15 from Eddie Johnson with all that detail. How did Eddie  
16 Johnson's lawyer get all that detail to put it into a  
17 document?

18 MR. LEONARD: Objection. Calls for  
19 speculation, lacks foundation.

20 BY MR. MCLAUGHLIN:

21 Q. You can answer.

22 A. Because I have a meeting with the lawyers.

23 Q. No. We're not talking -- these two lawyers  
24 are with the city of Chicago. This is Eddie Johnson's  
25 lawyer.

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1 A. With his lawyer too, I'm sorry.

2 Q. Eddie Johnson's lawyer produced this document

3 --

4 A. Yes.

5 MR. MCLAUGHLIN: well before your deposition,  
6 with a lot of detail about what you were going to  
7 testify about. How did Eddie's lawyer get that  
8 information?

9 MR. LEONARD: Objection.

10 MS. WOYTOWICZ: Objection.

11 MR. LEONARD: Lacks foundation, calls for  
12 speculation.

13 MS. WOYTOWICZ: Join.

14 THE WITNESS: I have a meeting with the  
15 lawyers.

16 BY MR. MCLAUGHLIN:

17 Q. With what lawyer?

18 A. I had called for -- I -- I had called for the  
19 lawyers for testify.

20 Q. Okay.

21 A. For make my statement.

22 Q. You had a call with Eddie Johnson's lawyers?

23 A. Yes, sir.

24 Q. Was it Mr. Leonard?

25 A. No, it was -- I forgot his name. I forgot

1 his name. It was -- he's born in, I think it was --

2 Q. Was his name Frank?

3 A. I don't recollect his name.

4 Q. Okay. How many times did you have a  
5 conversation with Eddie Johnson's lawyers, any lawyers,  
6 for Eddie Johnson, before today?

7 A. One time.

8 Q. And what did you tell that lawyer during that  
9 conversation?

10 A. Same statement that I make today.

11 Q. Which is what?

12 A. All the details that the incident happen.

13 Q. I -- I want to hear from you. What did you  
14 tell Eddie Johnson's lawyer or any lawyers for Eddie  
15 Johnson, before today about your testimony?

16 A. The 2019, I was driving my documents from my  
17 tuition reimburse programing. And my student  
18 forgiveness loan at the headquarters, January, 2019.  
19 When I met Cynthia Donald, who was working at the  
20 headquarters. And we exchanged phone numbers, we talk  
21 about the job she's doing. I talk about the job that  
22 I'm doing. At the time I was working at Saturation  
23 Team area central one. And Cynthia Donald stated that  
24 she was a detail at -- at a bodyguard, superintendent's  
25 details. I told her, I said, "Great, that's



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1     congratulations." I stated that Eddie Johnson is a good  
2     guy, is a great mentor, he's a good supervise that she  
3     can learning, have a much experience she can. And she  
4     stated that Eddie Johnson have highly good words about  
5     me. That I'm very smart guy, very educated, very  
6     polite, very gentleman. And I told her that I know him  
7     when -- when I started this shop, because he was -- he  
8     was my commander at sixth district. And then that was  
9     that -- the last conversation.

10           Q.     That's all you remember telling any of Eddie  
11     Johnson's lawyers before today about your testimony?

12           A.     And then -- no, and then we went to --  
13     regarding about the -- we have a conversation. The --  
14     I have a dinner with my friends in the north side.  
15     They come in a Korean restaurant, San Soo Gab San. We  
16     was approximately three -- three other friends. And  
17     Cynthia Donald called me and she asking me what I'm  
18     doing. And I stated that I have a dinner with friends  
19     in a Korean restaurant. So I invite to her to coming  
20     up to enjoy. And she stated that if she can bring a  
21     guest. A surprise guest. And I say, "Yeah, you're  
22     welcome to bring anyone for the dinner." And so Cynthia  
23     Donald and former superintendent Johnson arrived to the  
24     restaurant, and we have a dinner in the Korean  
25     restaurant.

1 Q. You testified today about a meeting that  
2 Cynthia Donald told you, she wanted to arrange in the  
3 state of Indiana. Do you remember that?

4 A. Yes, sir.

5 Q. Did she say she wanted anybody else to attend  
6 that meeting besides Eddie Johnson?

7 A. Only me and her and Eddie Johnson.

8 Q. And you've already said that she never told  
9 you anything specific about anything she wanted to do  
10 on her behalf, related to Eddie Johnson, correct?

11 A. Correct.

12 Q. So you'd have to speculate about anything she  
13 ever wanted you to do on behalf of Eddie Johnson,  
14 correct?

15 MR. LEONARD: Objection, lacks foundation.  
16 Contrary to his prior testimony.

17 BY MR. MCLAUGHLIN:

18 Q. Go ahead.

19 A. Correct.

20 Q. You said also that during the times you saw  
21 Eddie Johnson with Cynthia Donald, there was no  
22 physical contact, no touching, no kissing, correct?

23 A. Correct.

24 Q. When you saw Cynthia Donald with Eddie  
25 Johnson, she, quote, "Acted like his bodyguard."

1 Correct?

2 A. That's correct.

3 Q. And she acted professionally, correct?

4 A. Correct.

5 Q. You said in February, 2020, you called Eddie  
6 to congratulate him on retiring, correct?

7 A. 2020?

8 Q. February, 2020?

9 A. Yes sir.

10 Q. Do you know why he retired?

11 A. He got -- I believe so. He put the documents  
12 for his retire, from the papers, for retire.

13 Q. Do -- do you -- is your understanding he just  
14 voluntarily retired --

15 A. Yes.

16 Q. Because he was done working for CPD?

17 A. Yes.

18 Q. It had nothing to do with him being found  
19 asleep behind the wheel, passed out?

20 MR. LEONARD: Objection. Lacks foundation  
21 calls for speculation.

22 THE WITNESS: I never asking, and he never  
23 stated.

24 BY MR. MCLAUGHLIN:

25 Q. Well, what do you think?

1 MR. LEONARD: Objection. Lacks foundation  
2 calls for speculation. Witness has already said he has  
3 no knowledge.

4 THE WITNESS: That he retired. That's it.  
5 He got all the time for retired.

6 BY MR. MCLAUGHLIN:

7 Q. So -- so you think it was a coincidence that  
8 he was found passed out behind the wheel, it was all  
9 over the news, and then he just suddenly retired  
10 because he wanted to?

11 MR. LEONARD: Objection. Asked and answered,  
12 lacks foundation, calls for speculation.

13 BY MR. MCLAUGHLIN:

14 Q. Go ahead.

15 A. I thought that he want to retire. He was  
16 over 20 years on the job, it's time for retire.

17 Q. Right. So you never put two and two together  
18 and thought, "Oh geez, maybe he's actually --

19 A. No.

20 Q. -- being forced out"?

21 A. Not at all.

22 Q. Again, that's because you're a yes man for  
23 Eddie Johnson, right?

24 MS. WOYTOWICZ: Objection, foundation.

25 MR. LEONARD: Objection to the

1     characterization.

2     BY MR. MCLAUGHLIN:

3             Q.     Go ahead.

4                     MR. LEONARD:   And the offensive, harassing  
5     nature of the question.

6     BY MR. MCLAUGHLIN:

7             Q.     Go ahead.

8             A.     Yes sir.

9             Q.     In Eddie's -- in your eyes, Eddie can do no  
10    wrong.    Right?

11            A.     That's vague question.   No one can do  
12    anything wrong --

13            Q.     I'm asking you about --

14            A.     Nobody -- nobody is perfect.

15            Q.     I'm asking you about Eddie Johnson.   In your  
16    eyes, Eddie Johnson can do no wrong.   Correct?

17            A.     He can do wrong.   He's a human being.

18            Q.     What has he done wrong, in your opinion?

19            A.     I don't know.   But he -- he's a human being.  
20    He's not a perfect man.

21            Q.     You can't think of anything he's done wrong  
22    that you can tell us about?

23            A.     Not that I have knowledge at all.

24            Q.     Nothing you've seen on the news or heard  
25    about through CPD?   Nothing you can think of?

1 MR. LEONARD: Objection. Lacks foundation,  
2 calls for speculation, calls for hearsay reliance.

3 BY MR. MCLAUGHLIN:

4 Q. Go ahead.

5 A. Nothing in the job that I have knowledge at  
6 all.

7 Q. So as you sit here and say you don't have one  
8 single incident you can tell us about, where Eddie  
9 Johnson did anything wrong?

10 A. No. In my career, no.

11 Q. Okay. Now you said that Cynthia Donald was  
12 talking about, quote, "Six figures," to you, right?

13 A. Yes, sir.

14 Q. She wasn't talking about seven figures?

15 A. No. Six figures.

16 Q. Figures. She wasn't talking about \$5  
17 million?

18 A. No.

19 Q. She wasn't talking about \$10 million?

20 A. No.

21 Q. She wasn't talking about \$15 million?

22 A. No.

23 Q. It was six figures.

24 A. Yes, sir.

25 Q. That's what you remember?

1           A.    Yes, sir.

2           Q.    You also said that at one point in time, she  
3   told you she destroyed a cellphone, right?

4           A.    Yes, sir.

5           Q.    Can you describe for us what that cellphone  
6   looks like?

7           A.    Her personal cellphone?

8           Q.    I'm talking about the phone that you said she  
9   told you she destroyed. Can you describe what that  
10   phone looked like?

11          A.    Not at all. I don't recall, a long time.  
12   No.

13          Q.    Do you know for sure what phone number was  
14   attached with that particular cellphone that she told  
15   you she destroyed?

16          A.    No.

17          Q.    You'd have to guess about that, right?

18          A.    Yes.

19          Q.    You said you have a British and Chinese  
20   cellphone carrier, is that right?

21          A.    Yes, sir.

22          Q.    What is the name of that company?

23          A.    Bican, or they call -- let's check it out  
24   here, it's --

25          Q.    Can you spell that for the record?

1 A. Yeah. Let me get -- I don't have my phone.

2 It's -- can I give it later? Because I got to get the  
3 spells and all the stats if you don't mind.

4 Q. Did you say Viking?

5 A. No, it's -- I don't have my phone here, but  
6 --

7 Q. Okay.

8 A. -- if you give me a minute, I'll give you the  
9 right spell for the all stat.

10 Q. Okay, but in any event, we can certainly get  
11 it from your lawyers. You'll give it to them?

12 A. Yes. I don't want to give you the wrong  
13 spell because then we will be all day.

14 Q. All right. Now, I want to talk about what  
15 you described as a bribe that was offered to you by  
16 Cynthia Donald?

17 A. Yes, sir.

18 Q. Do you know if bribes are illegal in the  
19 State of Illinois

20 A. In the state --

21 MR. LEONARD: Objection. Calls for legal  
22 conclusion, lacks foundation, calls for speculation.

23 BY MR. MCLAUGHLIN:

24 Q. You can answer.

25 A. I think yes, in the State of Illinois, a



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1     bribe, yeah.

2           Q.     So if whatever Cynthia Donald was offering to  
3     you or bribing you with, was that -- was that illegal  
4     in your -- in your opinion?

5           A.     Yes, sir.

6                   MR. LEONARD:  Objection.  Calls for a legal  
7     conclusion.

8     BY MR. MCLAUGHLIN:

9           Q.     Okay.  You can answer.

10          A.     Yes, sir.

11          Q.     Okay.  So since that was an illegal act that  
12     Cynthia Donald performed with you, and at that time,  
13     she was a CPD officer.  Correct?

14          A.     That's correct.

15          Q.     She still is a CPD officer.  Correct?

16          A.     Correct.

17          Q.     At that time, you were a CPD officer,  
18     correct?

19          A.     Correct.

20          Q.     Are you still a CPD officer?

21          A.     Yes, sir.

22          Q.     Okay.  So then what you're telling us is that  
23     at that time, an employed CPD officer made a bribe to  
24     another CPD officer, and that was an illegal bribe.  Is  
25     that your testimony?

1 MR. LEONARD: Objection, calls for legal  
2 conclusion. He can answer it.

3 BY MR. MCLAUGHLIN:

4 Q. Go ahead.

5 A. Yes, sir.

6 Q. Okay. So who did you report that illegal act  
7 to? And just give me a second because I'm going to  
8 write down all the places you reported that illegal  
9 act. Go ahead.

10 A. Nobody.

11 Q. Why?

12 A. Because it was a frank conversation.

13 Q. It was an illegal act by -- done by a CPD  
14 officer to a CPD police officer. You didn't tell  
15 anybody about it?

16 A. I don't know if it was true or not.

17 Q. Okay. So you don't even know if the bribe  
18 happened or not. It was just something made up or not  
19 made up or what? Tell us what happened.

20 A. The --

21 MR. LEONARD: Objection to the -- to the form  
22 of the question and the hostility towards the

23 BY MR. MCLAUGHLIN: WITNESS.

24 Q. Go ahead.

25 MR. LEONARD: I think you should take your

1 tone down.

2 BY MR. MCLAUGHLIN:

3 Q. Go ahead.

4 A. I don't know if she was serious or not.

5 Q. Okay. So it could have been a joke?

6 A. Yes.

7 Q. Okay. So certainly if it was something that  
8 was serious, you would've reported that. Correct?

9 A. Yes, sir.

10 Q. Okay, because if you don't report something  
11 like that, then you, yourself violate the CPD rules and  
12 regulations, correct?

13 A. That's correct.

14 Q. And as you said, you should be suspended or  
15 fired if you, as a CPD officer violate those rules and  
16 regulations. Correct?

17 A. Correct.

18 Q. That's all the questions I have.

19 REDIRECT EXAMINATION

20 BY MR. LEONARD:

21 Q. Just a couple thoughts. Sir, when he asks  
22 you about whether someone should be suspended or fired  
23 based upon a violation of a policy, there's hundreds of  
24 policies someone can violate, right?

25 A. That's right.

1 Q. You can't say whether someone should be  
2 suspended, fired, or verbally counseled, written  
3 warning until you know the facts of the situation.

4 A. That's correct.

5 Q. Right? And you would agree with me that, of  
6 course, you can't say whether someone should be --  
7 which the appropriate discipline until you know the  
8 facts. Right?

9 A. Exactly. You're right.

10 Q. And of course, you can't say that every time  
11 someone violates a policy, they should be fired.  
12 Right?

13 A. That's correct.

14 Q. Because that's not always the appropriate  
15 discipline?

16 A. That's correct.

17 Q. Okay. Let's talk a little bit about Cynthia  
18 Donald's attempts to bribe you. Okay? There was no  
19 question in your mind that she was dead serious, right?

20 MR. MCLAUGHLIN: Objection. Asked and  
21 answered.

22 BY MR. LEONARD:

23 Q. Correct?

24 A. Correct.

25 Q. She wasn't joking around?

1 A. Correct.

2 Q. She wasn't laughing?

3 A. Correct.

4 Q. She never made any suggestion to you ever  
5 that she was kidding?

6 A. Not at all.

7 Q. And in fact, when you turned her bribery  
8 request down, she got mad at you, yelled at you, cursed  
9 at you, called you an idiot and stupid, right?

10 A. That's right.

11 Q. Which reinforced the idea that she was dead  
12 serious about trying to pay you off with money and a  
13 promotion to help her in her scheme. Right?

14 A. Right.

15 Q. And you're not stupid. Are you?

16 A. Not all.

17 Q. And like Counsel said, you can put two and  
18 two together, right?

19 A. Yes, sir.

20 Q. And once you heard that she was making these  
21 allegations about superintendent Johnson, you  
22 understood exactly what she was trying to bribe you to  
23 do.

24 A. That's right.

25 MR. MCCLAUGHLIN: Objection asked --

1 BY MR. LEONARD:

2 Q. She was trying to make you make --

3 BY MR. LEONARD:

4 THE RECORDER: I'm sorry.

5 MR. MCLAUGHLIN: Sorry. Objection asked an  
6 answer.

7 Q. You put two and two --

8 MR. MCLAUGHLIN: Calls for speculation. Go  
9 ahead.

10 BY MR. LEONARD:

11 Q. You put two and two together and figured out  
12 she was trying to pay you off to cooperate in this  
13 allegedly six figure lawsuit against Eddie Johnson.  
14 Right?

15 A. Right.

16 Q. And you wouldn't do it, would you?

17 A. No, I wouldn't do it.

18 Q. Okay. You wouldn't take a bribe to assist  
19 anybody in a lawsuit, would you, sir?

20 A. I never would jeopardize -- never would  
21 jeopardize the blessing I have to live in this country  
22 working and going to school, have an American citizen  
23 and have the opportunity to have my dream from my  
24 family and people that I love. Never, never would do  
25 that.

1           Q.    And when you turned Cynthia Donald's bribery  
2   offer down, the person that she yelled at you about  
3   being too loyal to was Eddie Johnson, right?

4           A.    That's right.

5           Q.    Not to anybody else in the world?

6           A.    That's right.

7           Q.    Right, and she tried to -- tried to make the  
8   bribery request to you twice. She actually had you  
9   follow up call to you to see if you had changed your  
10   mind about accepting her bribe to cooperate in her  
11   scheme. Right?

12          A.    That's right.

13          Q.    And you turned her down again?

14          A.    That's right.

15          Q.    Okay. Now, Counsel asked you about turning  
16   her in for her bribery. If you could do things over  
17   again, is it fair to say you would've reported her?

18          A.    Yes, if I have all these facts I have right  
19   now.

20          Q.    Yeah.

21          A.    And I'm here for that reason, too.

22          Q.    Understood. And if you -- if you thought  
23   about it some more, you would've reported her?

24          A.    Yes.

25          Q.    Okay. And the second time she tried to bribe

1     you to see if you had changed your mind, you also  
2     believed that based upon her tone and what she said to  
3     you that she was again, deadly serious?

4           A.     Very serious.

5           Q.     She wasn't joking around.

6           A.     Not at all.

7           Q.     She wasn't kidding. Right?

8           A.     Right.

9           Q.     And once you turned her down the second time,  
10    she got angry at you again, right?

11          A.     That's right.

12          Q.     And the person that she said you were too  
13    loyal to in protecting was Eddie Johnson, right?

14          A.     That's right.

15          Q.     Nobody else in the world?

16          A.     Not at all.

17          Q.     Okay. Do you understand what Counsel means  
18    by being a yes man to Eddie Johnson? I didn't, but did  
19    you understand what he was talking about being a yes  
20    man to Eddie Johnson?

21          A.     Well, I assume the -- what I translated is  
22    like I'm a kind of man of follow orders or maybe  
23    loyalty owner. I think that's what I interpreted.  
24    They just -- sir, no, sir.

25          Q.     Okay. So you don't -- you -- when he says



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1     yes man, you don't just do everything anyone tells you.

2     Do you, sir?

3             A.     Not at all.

4             Q.     You're guided by a code of your own ethics.

5             A.     Exactly.

6             Q.     You're guided by a code of -- code of your  
7     own morality?

8             A.     Exactly.

9             Q.     You don't do things that you think are wrong,  
10    right?

11            A.     That's right, yeah.

12            Q.     And if someone tells you to do something,  
13    you're not what this guy calls a yes man. You have a  
14    lot of backbone, morals and ethics and you say no to  
15    things that are wrong. Right?

16            A.     Exactly.

17            Q.     And one of the things you said was wrong was  
18    Cynthia Donald's attempt to bribe you to cooperate in a  
19    scheme against Eddie Johnson?

20            A.     That's right.

21            Q.     Okay. And if you could do it over again, you  
22    now understand you probably had a reporting obligation  
23    to report her illegal conduct to CPD or maybe the Feds  
24    or somebody else?

25            A.     Yes.

1 Q. Okay. And if you could do it over again,  
2 would you have -- would you have reported her illegal  
3 bribery scheme to the Feds or to the CPD?

4 A. Yes.

5 Q. Okay. You feel that's a mistake you made?

6 A. Yes.

7 Q. Okay, but when you were talking to her, you  
8 also had a friendship with her, right?

9 A. Yes.

10 Q. And so your friendship and good feelings told  
11 -- towards her may have influenced your not reporting  
12 her to the Feds or to CPD?

13 A. Yes, at the time, yes.

14 Q. Because you thought it was a stupid  
15 cockamamie scheme and that she shouldn't be doing it?

16 A. Yes, sir.

17 Q. And you didn't felt -- feel good about  
18 turning your friend into the Feds. Did you?

19 A. That's right.

20 Q. Because you thought she was misguided?

21 A. That's the right word you use, sir.

22 Q. Okay.

23 A. Misguide.

24 Q. But because of the legalities of all this, if  
25 you could go back in time, you would have reported her

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1 to the Feds, maybe the FBI or somebody like that,  
2 right?

3 A. Yes, sir.

4 Q. Okay, because what she was doing was 100  
5 percent wrong?

6 A. Definitely, 100 percent wrong.

7 Q. Okay. Thank you, sir.

8 RECROSS EXAMINATION

9 BY MR. MCLAUGHLIN:

10 Q. Sir, in the CPD rules and regulations, does  
11 it say anywhere that if a fellow CPD officer is your  
12 friend, you don't have to report them for a crime?

13 MS. WOYTOWICZ: Objection, foundation.

14 BY MR. MCLAUGHLIN:

15 Q. Go ahead.

16 A. If he -- if he's a criminal, yeah, you got to  
17 report it.

18 Q. Right. So it doesn't matter if it's your  
19 friend or not, you got to report that crime, right?

20 A. You got to report, yes.

21 Q. So Cynthia Donald was your friend, you still  
22 had to report that crime and that bribe. Right?

23 A. But at the time, like I say, I never thought  
24 it was seriously and that she was my friend.

25 Q. Okay. So at the time, you didn't think

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1     whatever she was saying to you was that serious and it  
2     wasn't a bribe, right?

3             A.     Exactly.

4             Q.     Okay. And in these rules and regulations --  
5     I'm going to read a couple of them to you. Now, Rule  
6     21 says: failure to report promptly to the department  
7     any information concerning any crime or other unlawful  
8     action. Were you aware of that rule?

9             A.     Yes, sir.

10            Q.     Okay. So we're now two and a half years or  
11     so after she supposedly had this conversation with you  
12     about the money, right? Right?

13            A.     Yes.

14            Q.     Okay. So was two and a half years after  
15     something happened, prompt to take action?

16            A.     Well, at the time, I don't have all the facts  
17     that I have right now.

18            Q.     Yeah.

19            A.     At the time, I never -- she never stated or  
20     never say there was things related with this  
21     allegations or the media or et cetera. So at the time,  
22     it was only a conversation.

23            Q.     Okay. So when did you have all the  
24     information to realize that what you did was wrong?

25            A.     After all the facts. After all the news and

1 everything.

2 Q. Yeah, what date? Give me the exact date.

3 A. Well, after -- after the news that she make  
4 allegation for criminal sexual assault?

5 Q. What year was that?

6 A. It -- it was 2020 November, I think it was.  
7 October or November.

8 Q. Okay. November, 2020. So now, we're in  
9 July, 2022.

10 A. Yes, sir.

11 Q. Right? So from a -- from November, 2020 to  
12 July 2022 --

13 A. Yeah.

14 Q. -- you had all this information, you still  
15 haven't reported it to CPD, right?

16 A. Well, I'm here for that reason.

17 Q. I know I'm not CPD. You've never reported it  
18 to CPD, right?

19 A. No, not at that time. No.

20 Q. Okay. This is a private lawyer for Eddie  
21 Johnson who's the Defendant in this lawsuit.

22 A. Uh-huh.

23 Q. Okay. So it doesn't matter if you reported  
24 to him. Right?

25 A. Well, I reported to the city lawyers and the

1 lawyers so --

2 Q. I know let's start with --

3 A. And I reported to the FOP. Monday, they have  
4 this statement.

5 Q. Okay. Let's start with Eddie's lawyer. Does  
6 it say in the rules and regulations that you've -- you  
7 adhere to your duties if you report crimes to private  
8 lawyers for defendants and lawsuits?

9 A. And can you read again, please?

10 Q. Does it say in the rules and regulations --

11 A. Yeah.

12 Q. -- that you adhered to your duty to report  
13 when you report a crime to a private attorney for a  
14 defendant in a lawsuit?

15 A. To FOP, yes, he did.

16 Q. No, to a defendant in a lawsuit?

17 A. To the defendants in a lawsuit? No, I'm not  
18 sure.

19 Q. Okay.

20 A. Because I'm not a lawyer. I'm not  
21 technicality --

22 Q. I know. You're a CPD officer, right?

23 A. Yes.

24 Q. And you know these rules and regulations,  
25 right?

1 A. Yes.

2 Q. So what about the city lawyers? When, for  
3 the first time, did you say to them there was a crime  
4 committed?

5 A. I don't remember exactly when we met. Last  
6 year, I believe so.

7 Q. Okay. What about the FBI or the attorney  
8 general, anybody else? Did you go to them and say, oh  
9 my God. A fellow CPD officer committed a crime because  
10 she tried to bribe me?

11 A. Not at all.

12 Q. Are you going to do that after the deposition  
13 today?

14 A. I don't know if you can do it or not.

15 Q. I know, but do you want to do that?

16 A. Huh?

17 Q. Or do you want to do that?

18 A. If I have to, yes.

19 Q. Are you going to?

20 A. But I don't know the procedures legally.

21 Q. I want to know if you're going to?

22 MR. LEONARD: Well, Counsel, this has nothing  
23 to do with it. If you're trying to get -- if you're  
24 trying to stop him, if you're trying to obstruct -- if  
25 you're trying to obstruct --

1 MR. MCLAUGHLIN: Objection. I'm saying  
2 objection. Form and foundation, form, and foundation.  
3 Federal deposition, form, and foundation.

4 MR. LEONARD: You'll let me speak. If you're  
5 trying --

6 MR. MCLAUGHLIN: Go ahead.

7 MR. LEONARD: to obstruct justice by --

8 MR. MCLAUGHLIN: I want enforce justice. I'm  
9 asking if he's going to report it.

10 MR. LEONARD: It sounds like you're not.

11 THE RECORDER: One person at a time.

12 MR. MCLAUGHLIN: I mean, this is -- I mean,  
13 this outrageous. We've got crimes being committed. I  
14 hope they're going to get reported. Are you going to  
15 report this crime?

16 MR. LEONARD: Counsel, I wasn't done  
17 speaking. If you're trying to dissuade the witness and  
18 trying to get him to obstruct justice, if you're trying  
19 to dissuade him from reporting, I object to that.

20 BY MR. MCLAUGHLIN:

21 Q. What I said was, are you going report it? I  
22 hope you are going to report it. If this is real, if  
23 your testimony is real, you're going to report this  
24 right?

25 A. If it's real, yes.



1 Q. Is it real? I'm asking you.

2 A. Yes.

3 Q. Okay. When are you going to report it?

4 A. Well, I don't know the instructions what are  
5 the next procedure. I'm not a lawyer.

6 Q. Okay. So --

7 A. I got to follow the legal procedures now.

8 Q. Right. You're a CPD officer, right?

9 A. Yes.

10 Q. Okay. And you have a duty to report crimes,  
11 right? So I'm asking you, when are you going to report  
12 this crime officially?

13 MS. WOYTOWICZ: Objection. Asked and  
14 answered.

15 BY MR. MCLAUGHLIN:

16 Q. Go ahead.

17 A. When I can do. Now, that you told me that I  
18 got to do it.

19 Q. Okay. So you're going to --

20 A. You line me. You told me you got to do it so  
21 I got to do it because I'm --

22 Q. I'm not telling you anything. I'm asking you  
23 a question.

24 A. You did because you --

25 Q. I'm asking a question. Let me talk.

1 THE RECORDER: One person at a time, please.

2 MR. LEONARD: He's already answered your  
3 question. Right? Stop you can --

4 BY MR. MCLAUGHLIN:

5 Q. Question is when -- when you report this  
6 crime --

7 A. Yes, sir.

8 Q. Okay? Please be sure to tell the lawyers for  
9 the City of Chicago so we can find out about it and we  
10 can read that report. Okay?

11 A. If I report it today?

12 Q. Yes, or whenever you report it.

13 A. Okay.

14 Q. Okay. The other rule that you violated is  
15 Rule 22, which is failure to report to the department  
16 any violation of rules and regulations or any other  
17 improper conduct, which is contrary to the policy,  
18 orders, or directives of the department. Correct?

19 MS. WOYTOWICZ: Objection, foundation.  
20 Argumentative.

21 BY MR. MCLAUGHLIN:

22 Q. Go ahead.

23 A. I didn't violate anybody -- the statement  
24 there, I didn't violate anything. So my -- from my  
25 point of view.

1 Q. Well, you said you put the whole puzzle  
2 together in November 2020, and now, we're in July, 2022  
3 --

4 A. Yes.

5 Q. -- and you still haven't reported it. So  
6 under Rule 22, you violated that. Right?

7 A. Is the limit the statute for that?

8 Q. Sorry?

9 A. It's a limit statute for that?

10 Q. Is there a statute for it?

11 A. A limited, a limited statute --

12 Q. I have no idea. I'm asking about Rule 22.

13 A. And is it right there --

14 Q. Do you want me to read it again?

15 A. Limited Statute?

16 THE RECORDER: Did you say unlimited or  
17 limited?

18 THE WITNESS: Limited statute?

19 BY MR. MCLAUGHLIN:

20 Q. Do you want me to read it again?

21 A. No, but it's -- I asking you is any time --  
22 timeline.

23 Q. Okay.

24 A. It's a timeline?

25 Q. I'm asking you, okay? I'm asking the

1 questions here. Rule 22 --

2 A. Yes, sir.

3 Q. -- which I just read to you.

4 A. Yes, sir.

5 Q. You violated Rule 22 because still to this  
6 date, after you put the puzzle together, November 2020,  
7 you never reported this alleged crime, this bribe,  
8 right?

9 MR. LEONARD: Objection.

10 MS. WOYTOWICZ: Objection.

11 MR. LEONARD: This has been asked and  
12 answered like 40 times.

13 MR. MCLAUGHLIN: No we're on diff- -- this is  
14 --

15 MR. LEONARD: No. No. It has been asked and  
16 answered multiple times and it calls for a legal  
17 conclusion.

18 BY MR. MCLAUGHLIN:

19 Q. Sorry, we're on Rule 22. He's already said  
20 he violated rule 21. We're onto a different rule so  
21 it's a different line of questioning. Go ahead. You  
22 can answer.

23 A. My question is to --

24 Q. No, no, no, no. You don't ask questions in a  
25 deposition. I'm asking you questions.

1 MR. LEONARD: No, he is allowed to ask you a  
2 question --

3 MR. MCLAUGHLIN: He's not allowed to ask  
4 question.

5 MR. LEONARD: Yes, he is. If he -- if he  
6 wants clarification, Robert, you can't talk about --  
7 BY MR. MCLAUGHLIN:

8 Q. Go ahead, go ahead.

9 MR. LEONARD: If he wants to ask you for  
10 clarification, he's allowed to. Don't tell him he  
11 can't do it because he wants --

12 THE WITNESS: Can you read to me for me  
13 again? The --

14 BY MR. MCLAUGHLIN:

15 Q. Rule 22?

16 A. Yes sir.

17 Q. Sure. Rule 22 says failure to report to the  
18 department any violation of rules and regulations or  
19 any other improper conduct, which is contrary to the  
20 policy, orders, or directives of the department.

21 A. Okay. It's a timeline?

22 Q. That's what the rule says, period.

23 A. It's a timeline. It's a timeline.

24 Q. I'm asking you about that sentence and not  
25 about timeline. This is my question.

1 A. It's a timeline.

2 Q. I don't know what you're saying.

3 A. If I do the -- if I do the report today, it's  
4 a timeline?

5 Q. I have no idea. I'm asking you a simple  
6 question.

7 A. It's a violation if I do the -- my report  
8 today now.

9 Q. Do you want to answer my question.

10 MR. LEONARD: He is answering your question.

11 THE WITNESS: I answer your question.

12 BY MR. MCLAUGHLIN:

13 Q. You didn't. My question is, do you admit  
14 that you violated Rule 22 --

15 A. No.

16 Q. -- because to -- let me get my question out.

17 A. No.

18 Q. Okay. Do you admit that you violated Rule 22  
19 because to this date, okay, after November, 2020  
20 through July, 2022, you've never formally reported this  
21 alleged bribe?

22 A. No.

23 Q. Okay. Why is that?

24 A. It's not -- it is not timeline.

25 Q. Okay. So if I understand you correctly, you

1 have under the rules and regulations of the CPD until  
2 infinity to report a violation of these rules?

3 MR. LEONARD: Objection. That's not the  
4 witness testimony, and he also has asked you a question  
5 multiple times, but this has been asked and answered  
6 multiple times, and it also calls for legal conclusion.

7 BY MR. MCLAUGHLIN:

8 Q. Go ahead. I'm trying to learn about his  
9 statute of limitations. When do you think you have  
10 until to report a crime by a fellow CPD officer?

11 A. Did they say there in this statement?

12 Q. No. I'm asking you, when do you think?

13 A. I'm asking a question.

14 Q. I don't know. I'm reading Rule 22. It has a  
15 period.

16 A. You're a lawyer. You am not.

17 Q. Yeah. It has a period at the end.

18 A. It's not their timeline.

19 Q. Yeah, I'm asking you this question.

20 A. Yes, sir.

21 Q. When do you think you have until to report a  
22 crime by a fellow CPD officer?

23 A. Until you're a formative police officer in  
24 working a -- in the capacity of the Chicago police  
25 officer.

1 Q. Can you say that one more time?

2 A. If you're still on the job, you're still  
3 under work, you still have the time for -- to do it.

4 Q. Okay. So if I understand you correctly, you  
5 have until as long as you're employed as a CPD officer  
6 to report a crime by a fellow CPD officer. There's no  
7 date by which you have to do it?

8 A. Depending on the crime, too.

9 Q. Okay. And you have never, to this date made  
10 a formal report, a written report, anything like that,  
11 about this alleged crime to the CPD. Correct?

12 A. No.

13 Q. Meaning, correct?

14 A. Yes, correct, yeah.

15 Q. No more questions.

16 REDIRECT EXAMINATION

17 BY MR. LEONARD:

18 Q. Sir, do you have any objection to us filing  
19 this transcript with the judge in this case to let the  
20 Court know that Ms. Donald attempt to bribe you to gain  
21 your cooperation? You have any objection to us doing  
22 that?

23 A. No, I don't. I mean, I have no objection,  
24 no.

25 Q. Okay. And I just want to go through --



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1 because Counsel keeps asking you the same questions and  
2 yelling at you. I just want to make sure we're all on  
3 the same page. Okay? So I want to go back to the  
4 first call where Ms. Donald asked you about, you know,  
5 the two elements of the bribery. So the first call, as  
6 you said, was in approximately April or so of 2020,  
7 right?

8 A. That's right.

9 Q. And the two things she wanted to bribe you  
10 with was one, she indicated that first, she could take  
11 care of you with money, right?

12 A. That's right.

13 Q. And then she -- she got more specific. She  
14 indicated that she could actually pay for your father's  
15 healthcare --

16 A. That's right.

17 Q. -- if you cooperated with her?

18 A. That's right.

19 Q. She would give you the money for you to pay  
20 for your father's healthcare if you cooperated with her  
21 in her plot against Eddie Johnson?

22 A. That's right.

23 Q. Okay. And the second part of the bribery was  
24 that, not only would she give you money to pay for your  
25 father's healthcare, but that she somehow would get you

1 a promotion within Chicago Police Department, right?

2 A. That's right.

3 Q. Okay. Now, at that time, during that phone  
4 call, you thought she was dead serious about both of  
5 those propositions, right?

6 A. Yes.

7 Q. There was no doubt in your mind that she was  
8 not kidding around or joking?

9 A. Not at all.

10 Q. And in fact, when you turned her down, she  
11 got very angry at you?

12 A. That's right.

13 Q. And she claimed that you essentially had a  
14 misguided loyalty to the superintendent?

15 A. That's right.

16 Q. And that you were stupid and an idiot, right?

17 A. That's right.

18 Q. Which just reinforced the idea that she was  
19 extremely serious about the two bribery elements,  
20 right?

21 A. That's right.

22 Q. And now, the second phone call, her follow up  
23 call to you on one of these various numbers she was  
24 using was her attempt to call you to see if you had  
25 changed your mind about the bribery scheme she had

1     offered you, right?

2           A.     That's right.

3           Q.     And again, you didn't think she was kidding  
4     or joking around?

5           A.     That's right.

6           Q.     You thought she was deadly serious, right?

7           A.     That's right.

8           Q.     And you turned her down?

9           A.     That's right.

10          Q.     And then when you turned her down, she got  
11     very angry with you?

12          A.     That's right.

13          Q.     Swore at you, right?

14          A.     That's right.

15          Q.     Called you names?

16          A.     That's true.

17          Q.     And again, claimed that you were too loyal to  
18     Eddie Johnson and that you were stupid for being so  
19     loyal to him?

20          A.     That's right.

21          Q.     So on both calls, she's -- she's connecting  
22     the bribery to Eddie Johnson and things that you would  
23     need to do with regard Eddie Johnson?

24          A.     That's correct.

25          Q.     Right, and then when you got the final piece

1 of the puzzle so to speak was when all of a sudden you  
2 heard she was claiming that Eddie Johnson had engaged  
3 in some improper conduct to her?

4 A. That's correct.

5 Q. And you're able to tie the elements of the  
6 bribery to her lawsuit?

7 A. That's true.

8 Q. And in fact, one of the reasons why you were  
9 able to do that is because she told you that she  
10 deserved six figure compensation for what had happened  
11 to her?

12 A. That's right.

13 Q. Okay. And again, if you could do things, if  
14 you could go back in the past and do things over, do  
15 you think the appropriate thing would've been to turn  
16 that information over to the FBI or federal authorities  
17 so they could investigate?

18 A. That's correct.

19 Q. And if you could do it over, you would do  
20 that?

21 A. Yes.

22 Q. And do you have any objection to us turning  
23 over this transcript to federal prosecutors and FBI so  
24 that they can determine whether she committed a  
25 violation of federal law?

1 A. Not at all.

2 Q. Okay. Do you have any objection to us giving  
3 a copy of this to the Cook County state's Attorney's  
4 Office so they can investigate her for bribery?

5 A. Not at all.

6 Q. Okay. And do you have any objection to us  
7 bringing this attention to the federal district court  
8 Judge by way of a motion seeking dismissal of her case  
9 because of her attempt to bribe you as a witness in  
10 this matter?

11 A. Not at all.

12 Q. Okay. Thank you for your time.

13 MS. WOYTOWICZ: Okay.

14 MR. MCLAUGHLIN: I have a question. Go  
15 ahead.

16 MS. WOYTOWICZ: I have a couple follow-up  
17 questions.

18 MR. MCLAUGHLIN: No, go ahead.

19 CROSS EXAMINATION

20 BY MS. WOYTOWICZ:

21 Q. Just a couple quick ones. The calls in  
22 April, 2020 that you said were from four or five  
23 different phone numbers, do you remember that?

24 A. Yes.

25 Q. Did she tell you where the other numbers came

1 from?

2 A. Not at all.

3 Q. Okay. And then the call prior to that with  
4 the compensation discussion, did Ms. Donald tell you  
5 whether she'd attempted to contact Eddie herself?

6 A. I'm sorry. Can you repeat?

7 Q. When you were discussing the compensation  
8 conversation with Ms. Donald, did she tell you whether  
9 she'd tried to contact Mr. Johnson herself?

10 A. Yes.

11 Q. And what did she say about contacting him?

12 A. That she frustrated because she cannot get in  
13 contact with him.

14 Q. Okay. And did Eddie Johnson do you any  
15 favors in your career?

16 A. Not at all.

17 Q. Did you ever ask him to do you any favors in  
18 your career?

19 A. Never.

20 Q. That's all.

21 MR. LEONARD: Do you want to review the  
22 transcript for accuracy or do you want to, what's  
23 called waive signature where Christina's transcript  
24 would stand as your testimony?

25 THE WITNESS: I trust her.

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1 MR. LEONARD: What's that?

2 THE WITNESS: I trust that it...

3 MR. LEONARD: You trust the transcript?

4 THE WITNESS: Yes.

5 MR. LEONARD: Okay. Thanks for your time.

6 We appreciate it.

7 THE RECORDER: Off the record, 12:01 p.m.

8 (Off the record)

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## 1 CERTIFICATION

2 I, Christina Kollintzas, do hereby certify  
3 that the foregoing transcript of said deposition is a  
4 true, complete and correct report of the entire  
5 testimony so given by said witness, together with such  
6 other matters and things as counsel for the parties  
7 present at the taking of said deposition desire to have  
8 appear of record.

9 I further certify that on July 14, 2022 said  
10 witness, CLAUDIO EDUARDO SALGADO YANEZ was first duly  
11 sworn to testify to the truth, the whole truth and  
12 nothing but the truth in the cause aforesaid; that the  
13 testimony then was recorded by audio/visual recording  
14 device, by me in the presence of said witness and  
15 thereafter transcribed into typewriting under my  
16 direction and control.

17 I further certify that I am not counsel for,  
18 nor attorney for any of the parties to the aforesaid  
19 cause, nor am I related to any of the parties to the  
20 aforesaid cause, nor am I interested in any manner in  
21 the said cause or in its outcome.

22

23

24

25



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1 I further certify that the signature to the  
2 foregoing deposition was waived by the witness.

3 IN TESTIMONY WHEREOF: I have hereunto set  
4 my hand and affixed my notarial seal:

5

6

7

Christina Kollintzas

8

July 29, 2022

9

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